February 2021| Initial Study/Negative Declaration

HAMILTON HIGH SCHOOL

Comprehensive Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: William Meade, Environmental Planning Specialist
213.241.3432

Prepared by:

Meridian Consultants LLC
920 Hampshire Road, Suite A5
Westlake Village, California 91361

[*This page intentionally left blank.*]

February 2021| Initial Study/Negative Declaration

HAMILTON HIGH SCHOOL

Comprehensive Modernization Project

[*This page intentionally left blank.*]

Table of Contents

Table of Contents

APPENDICES

(Provided on the compact disc attached to the back cover)

Table of Contents

List of Figures

List of Tables

Table of Contents

[*This page intentionally left blank.*]

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ALUC	airport land use commission
ANSI	American National Standards Institute
AQMP	air quality management plan
BOE	[LAUSD] Board of Education
BMP	best management practices
CalEMA	California Emergency Management Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CHP	California Highway Patrol
CHPS	Collaborative for High Performance Schools
CIFF	California Important Farmland Finder
CMP	Los Angeles County Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CUPA	certified Unified Program agency
CWC	California Water Code
DGS	Department of General Services
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EOP	Emergency Operation Plan
FEMA	Federal Emergency Management Agency

Abbreviations and Acronyms

FHWA	Federal Highway Administration
GHG	greenhouse gases
GWP	global warming potential
H&SC	California Health and Safety Code
HRA	health risk assessment
IP	Internet Protocol
IPCC	Intergovernmental Panel on Climate Change
LAA	Los Angeles Aqueducts
LADOT	City Department of Transportation
LADWP	City Department of Water and Power
LAPD	City Police Department
LAPL	Los Angeles Public Library
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LID	Low Impact Development
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MMT	million metric tons
$MMTCO_2e$	million metric tons of CO_2e
MND	mitigated negative declaration
MT	metric ton
$MTCO_2e$	metric ton of CO_2e
MRZ	mineral recovery zone
MUTCD	California Manual on Uniform Traffic Control Devices
MW	megawatts
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System

Abbreviations and Acronyms

OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OPSC	California Office of Public School Construction
PDF	project design features
ppm	parts per million
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
RCRA	Resource Conservation and Recovery Act
RWQCB	regional water quality control board
SAS	School for Advanced Studies
SC	Standard Condition [of Approval]
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAQMP	South Coast Air Quality Management Plan
SCS	sustainable communities strategy
SERRF	Resource Recovery Facility
SoCAB	South Coast Air Basin
SRTS	Safe Routes to School
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
US EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume-to-capacity ratio
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds

Abbreviations and Acronyms

[*This page intentionally left blank.*]

.

1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Hamilton High School (Hamilton HS), located at 2955 South Robertson Boulevard, City of Los Angeles (City), County of Los Angeles (County), California (Project site). Comprehensive Modernization Projects are designed to address the most critical physical needs of the building and grounds at the Hamilton High School Campus (Campus) through building replacement, renovation, modernization, and reconfiguration. The proposed Hamilton High School Comprehensive Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study/Negative Declaration provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a $7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.[1]

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.[2] Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.[3]

On December 13, 2016, the BOE approved the project definition for the "Comprehensive Modernization Project" of Hamilton HS, along with ten other schools. The proposed improvements would provide facilities that are safe, secure, and better aligned with the current instructional program. Assessments of the campuses within the Comprehensive Modernization Project were done by industry professionals, as well as seismic and historical personnel. The findings of these assessments in addition to input from community members, school users, and stakeholders, called for improvements with an anticipated cost of over $1.4 billion. The proposed

1 LAUSD*, Board of Education Report, "*Report. 13/14 ed. Vol. 143." Los Angeles, CA: LAUSD, 2013.
2 LAUSD, *Board of Education Report,* "Report. 13/14 ed. Vol. 143." Los Angeles, CA: LAUSD, 2013.
3 LAUSD, *Board of Education Report*, "LAUSD Regular Meeting Stamped Order Of Business Report. 15/16 ed. Vol. 159." Los Angeles, CA: LAUSD, 2015.

Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.[4]

Additionally, on September 18, 2018, a Board informative was issued that provided an update on the Facilities managed Bond Program with a focus on the 22 approved comprehensive modernization projects, including Hamilton HS.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[5] and the State CEQA Guidelines.[6] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies." In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[7]

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR[8]; however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[9]

1.4 ENVIRONMENTAL PROCESS

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

4 LAUSD, *LAUSD Board of Education Report—Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project*. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.
5 *California PRC*, §21000 et seq (1970).
6 *California Code of Regulations*, Title 14, Division 6, Chapter 3, §15000 et seq.
7 *California Code of Regulations*, Title 14, Division 6, Chapter 3, §15063.
8 *California Code of Regulations,* Title 14, Division 6, Chapter 3, §15064.
9 *California Code of Regulations*, Title 14, Division 6, Chapter 3, §15070.

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

The proposed actions by LAUSD constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.4.1 Initial Study

This Initial Study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that a ND is the appropriate level of environmental documentation for this project.

1.4.2 Negative Declaration

The ND includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the ND when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the Initial Study/ND is provided in the Initial Study Checklist (Chapter 4).

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. For details on the outreach process, comments received, and responses to comments, please refer to **Appendix J: Response to Comments**.

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.[10] LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[11] The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[12]

The Program EIR is applicable to all projects implemented under the School Upgrade Program. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[13] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:[14]

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus
- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location, and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the Program EIR.

The proposed Project is considered a site-specific project under the Program EIR; therefore, this ND is tiered from the SUP Program EIR. The Program EIR is available for review online at: http://achieve.lausd.net/ceqa

10 *Program EIR for the School Upgrade Program*, 2015, http://achieve.lausd.net/ceqa.
11 *Program EIR for the School Upgrade Program*, 2015, http://achieve.lausd.net/ceqa.
12 *California Code of Regulations,* Title 14, § 3 Article 1-15152(a).
13 Ibid, at 4-8.
14 Ibid, at 1-7.

and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.4 Project Plan and Building Design

The project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[15] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[16]

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a Statewide green building standards code and is applicable to residential and nonresidential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The Board of Education adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has

15 *California Green Building Standards Code*, Title 24, Part 11.

16 The Board of Education's October 2003 *Resolution on Sustainability and Design of High Performance Schools* directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including on-site treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project design features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, State, and local laws and regulations; PDFs; and SCs.

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[17] Federal, State, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

17 CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.

1.5 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY/NEGATIVE DECLARATION

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study/Negative Declaration are that the proposed Project would have no significant impacts. This report contains the following sections:

Chapter 1, ***Introduction*** identifies the purpose and scope of the ND and supporting Initial Study and the terminology used.

Chapter 2, ***Environmental Setting*** describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the proposed Project site and surrounding area.

Chapter 3, ***Project Description*** identifies the location, provides the background, and describes the scope of the proposed Project in detail.

Chapter 4, ***Environmental Checklist and Analysis*** presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the CHPS criteria, PDFs, Standard Conditions of Approval, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study/ND; therefore a stand-alone bibliography section is not required.

Chapter 5, ***List of Preparers*** identifies the individuals who prepared the ND and supporting Initial Study and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this CEQA Initial Study/ND.

A. Air Quality Study
B. Arborist Report
C. Historic Resource Evaluation Report
D. Historic Resources Technical Report
E. Report of Geotechnical Investigation
F. Phase I Environmental Site Assessment
G. Noise Study
H. Site Circulation Report
I. Sacred Lands File Record Search
J. Response to Comments

2. Environmental Setting

2.1 PROJECT LOCATION

The approximately 20.7-acre proposed Project site is located at 2955 South Robertson Boulevard (Assessor Parcel Number [APN] 4311-031-901) in the community of Castle Heights, City of Los Angeles, County of Los Angeles. Regional access to the site is from Robertson Boulevard and Interstate-10 (see **Figure 1: Regional Location**).

The Project site is bounded by Cattaraugus Avenue to the northeast, South Robertson Boulevard to the east, Kincardine Avenue to the south, and South Canfield Avenue to the west. Regionally, the Project site is approximately 6.8 miles from the Pacific Ocean to the west, approximately 3.2 miles from State Highway 2 to the north, approximately 6.7 miles from Interstate- 110 to the east, and approximately 0.2 miles from Interstate-10 to the south.

2.2 SURROUNDING LAND USES

Land uses surrounding the Project site are composed of single- and multifamily residential, mixed-use commercial, and other commercial uses. Commercial activities adjacent to the Project site are concentrated near the eastern portion of the site, across the street along Robertson Boulevard and Kincardine Avenue. There is a gas station (Shell) south and east of the Project site at the intersection of Kincardine Avenue and South Robertson Boulevard and a dry cleaner (Fancy Cleaners) north of the northeast corner of the Project site at the intersection of Robertson Boulevard and Cattaraugus Avenue.

The neighborhood is primarily residential west of the commercial buildings along South Robertson Boulevard. Across Cattaraugus Avenue from the Project site are a mix of multifamily residential buildings and single-family residences. Across Kincardine Avenue from the Project site are multifamily residential buildings. West of the Project site, across Canfield Avenue the land use is single-family housing (See **Figure 2: Surrounding Land Use**).

2.3 SENSITIVE RECEPTORS

Sensitive receptors are defined within the Los Angeles City General Plan as residences, schools, long-term care facilities, dormitories, motels, hotels, transient lodgings, hospitals, libraries, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, parks, and places of worship.

In addition to students, nearby sensitive receptors in close proximity to the proposed Project include single- and multifamily residences surrounding the Project site, as well as the Cheviot Hills Continuation (located adjacent to Hamilton HS), Green Beginning Community Preschool, Recording Connection Audio Institute,

Beverly Wood Retirement Home, Kenric Inc-Church of Christ, and Palms Westminster Presbyterian (See **Figure 3: Location of Sensitive Receptors** and **Table 1: Sensitive Receptors**).

Table 1

Sensitive Receptors

No.	Names	Address	Type	Location	Distance from Project site (Feet)
1	Single Family Home	9203 Cattaraugus Avenue Los Angeles, CA 90034	Residential	North of the Project site across Cattaraugus Avenue	55
2	Single Family Home	3003 Canfield Avenue Los Angeles, CA 90034	Residential	West of the Project site across Canfield Avenue	55
3	multifamily Residential	3105 Durango Avenue Los Angeles, CA 90034	Residential	South of the Project site across Kincardine Avenue	60
4	multifamily Residential	2980 Robertson Boulevard Los Angeles, CA 90034	Residential	East of the Project site across Robertson Boulevard	75
5	Green Beginning Community Preschool	3047 Robertson Boulevard Los Angeles, CA 90034	Church Uses	East of the Project site across Robertson Boulevard	155
6	Palms Westminster Presbyterian Church	2908 Robertson Place Los Angeles, CA 90034	Preschool	South of the Project site along Robertson Boulevard	230
7	Cheviot Hills Continuation	9200 Cattaraugus Ave, Los Angeles, CA 90034	Educational Uses	North of the Project, along Cattaraugus Avenue	145*
8	Recording Connection Audio Institute	2855 S Robertson Blvd, Los Angeles, CA 90034	Educational Uses	North of the Project along Hargis Street	275
9	Beverly Wood Retirement Home	9014 Hargis St, Los Angeles, CA 90034	Senior Home	North of the Project along Hargis Street	275
10	Kenric Inc-Church of Christ	3028 Livonia Ave, Los Angeles, CA 90034	Church Uses	South of the Project site across Kincardine Avenue	105

**Note: Located within Demo/Modernization Area and approximately 145 feet from demolition and new construction area.*

2.4 CAMPUS HISTORY

Population growth in the period from the 1920s to 1940s in the City of Los Angeles nearly doubled and the City boundaries expanded to encompass 441 square miles. This growth extended outward from the City's core, resulting in demand for services in newly settled neighborhoods, including the neighborhoods near Hamilton HS. As the population rapidly increased, the Los Angeles City School District (LACSD; predecessor of the LAUSD) struggled to keep pace with enrollment increases and the need for new schools and classrooms remained a constant issue. The LACSD acquired an undeveloped site to accommodate a new high school along Robertson Boulevard in 1930 and Hamilton HS opened in September of 1931 with an enrollment of 1,175 students.

After the initial school was built, several buildings were added in the 1930s, including the Assembly Building, a second gymnasium building, and a number of small buildings and bungalows. Additional construction occurred post-World War II as another wave of rapid population growth took place around the school site. A small music building was constructed in 1948, followed by a nearby storage unit in 1953. In 1958, Classroom Building 1 and a small Arts/Photography Building were constructed. By 1962, the school enrollment had grown to 3,200.

In the 1960s and 1970s, the original shop building, cafeteria, and several small bungalows were removed from the Campus. Subsequent to the removals, a new shop building, ancillary building, and Classroom Building 1 was constructed. In 1974, a new cafeteria building, baseball field, and tennis courts were constructed in the southern portion of the Campus. Additional developments include the 2004 construction of a new classroom building to the west of the Assembly Hall and the development of a parking structure at the southwestern corner of the Campus.[18]

2.4 EXISTING CONDITIONS

Hamilton HS is an L-shaped campus on an approximately 20.7-acre parcel, with 19 permanent and 6 portable buildings. The Campus opens towards the east with the administrative building at the front of school adjacent to South Robertson Boulevard. Most of the buildings on Campus are congregated around the northeast and central portions of the Campus, with the athletic fields and outdoor courts surrounding the buildings in the western and southern portions of the Campus. Most of the surface parking are along South Robertson Boulevard with limited additional parking towards the back of the school south of the track and field on South Canfield Avenue.

The school currently serves approximately 2,637 students, with approximately 130 teachers and 11 supporting staffs as of 2017-2018.[19] The programs at Hamilton HS includes a community school and two magnet schools: the Humanities Magnet with approximately 400 students and the Music Academy with approximately 950 students. Hamilton HS also provides School for Advanced Studies (SAS) and a UCLA Collaborative School Program. Feeder schools to Hamilton HS includes Webster Middle School, Palms Middle School, Emerson

18 LAUSD, Hamilton High School, *Historical Resources Evaluation Report*, October 2018.
19 LAUSD, Hamilton High School, *State Accountability Report Card*, http://search.lausd.net/cgi-bin/fccgi.exe?w3exec=sarc20172018&which=8686, Accessed 2/4/2020.

Middle School, and Mark Twain Middle School.[20] Cheviot Hills Continuation School is adjacent to the northwest corner of Hamilton HS and houses approximately 59 students and 7 teachers as of 2017-2018.[21]

A Site Circulation Report was completed by LIN Consultants and describes the existing circulation conditions at Hamilton HS. The designated loading/unloading zones for school buses are located along the north side of Kincardine Avenue and east side of Livonia Avenue between Durango Avenue and South Robertson Boulevard. There are no other designated loading/unloading zones around Campus and parents drop-off and pick-up students at various locations surrounding the school.

There are three staff parking lots on the Campus, one visitor parking lot, and one senior student and events' parking lot. The first faculty lot is located on the southeast corner of the school campus and is accessible by a gated entrance on the north side of Kincardine Avenue. The second faculty lot, located on the south side of the school campus near the intersection of Kincardine Avenue and Livonia Avenue, is accessible by a gated entrance on the north side of the intersection. A third faculty/staff parking lot is a covered parking garage located on the southwest portion of the Campus. A visitor lot on the northeast corner of the Campus is accessible by a gated entrance on the west side of South Robertson Boulevard. The parking lot used for senior student parking is located south of the track and football field and is accessible via a gated entrance on South Canfield Avenue.

Bus transit stops near the Campus and the Metro Expo Line Culver City Station located approximately 0.5 mile south of the Campus are utilized by some Hamilton HS students. Sidewalks exist on both sides of South Robertson Boulevard, Cattaraugus Avenue, Kincardine Avenue, Livonia Avenue, and South Canfield Avenue within the school zone. Crosswalks exist on both sides of Robertson Boulevard & Cattaraugus Avenue as well as South Robertson Boulevard & Kincardine Avenue.

See **Figure 4: Campus Circulation Site Plan** for the traffic circulation around the Project site.

Regular school hours at Hamilton HS start at 8:00 a.m. and end at 3:08 p.m.

2.5 GENERAL PLAN AND EXISTING ZONING

The Project site is designated by the City General Plan and the Palms-Mar Vista-Del Rey Community Plan as "Public Facilities" or PF-1.[22] PF is the designation for the use and development of publicly owned land in order to implement the City's adopted General Plan. Under the proposed Project, the use of the land falls under public elementary and secondary schools, which is allowed by the PF zoning designation. '1' is Height District No. 1.

The California legislature has granted school districts the power to exempt school property from local zoning requirements. Provided the school district complies with the terms of Government Code Section 53094. On

20 LAUSD, Cheviot Hills Continuation School, *School Plan for Student Achievement*, https://spsa.lausd.net/ArchivePlan/ArchivePlanDoc.aspx?Costcenter=1868601&SchoolYear=2019, Accessed 2/4/2020.
21 LAUSD, Cheviot Hills Continuation School, *State Accountability Report Card,* http://search.lausd.net/cgi-bin/fccgi.exe?w3exec=sarc20172018&which=8688, Accessed 2/4/2020.
22 *City Zone Information and Map Access System* (ZIMAS). http://zimas.lacity.org/. Accessed February 4, 2020.

February 19, 2019, pursuant to Government Code Section 53094, the LAUSD Board of Education adopted a Resolution rendering all LAUSD school sites, including Hamilton HS, exempt from local land use regulations (Bd. of Ed Rpt No. 256-18-/19).[23]

2.6 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, those listed below.

Responsible Agencies

A "Responsible Agency" is defined as a public agency other than the lead agency that has discretionary approval power over a project (CEQA Guidelines §15381). The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

- California Department of General Services (DGS), DSA. Approval of site-specific construction drawings.
- California Department of Transportation (Caltrans). Transportation permit for oversized vehicles on State highways.
- State Water Resources Control Board (SWRCB). Review of Notice of Intent to obtain general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan.
- Los Angeles Regional Water Quality Control Board (LARWQCB). General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City, Department of Building & Safety. Approval of haul route.
- City, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City, Public Works Department. Permit for curb, gutter, and other off-site improvements.

Trustee Agencies

"Trustee Agencies" include those agencies that do not have discretionary powers, but that may review the EIR for adequacy and accuracy. Potential Reviewing Agencies for individual projects to be implemented under the SUP may include the following:

State

- California Department of Conservation
- California Department of Fish & Wildlife (CDFW)
- California Department of Transportation
- California Highway Patrol (CHP)
- California Office of Historic Preservation
- California Resources Agency
- California State Lands Commission
- Native American Heritage Commission

Regional

- Metropolitan Transportation Authority (Metro)
- South Coast Air Quality Management District (SCAQMD)
- Southern California Association of Governments (SCAG)

23 LAUSD, *Board of Education Report*, "LAUSD Regular Meeting Stamped Order Of Business Report 256-18/19," February 19, 2019.

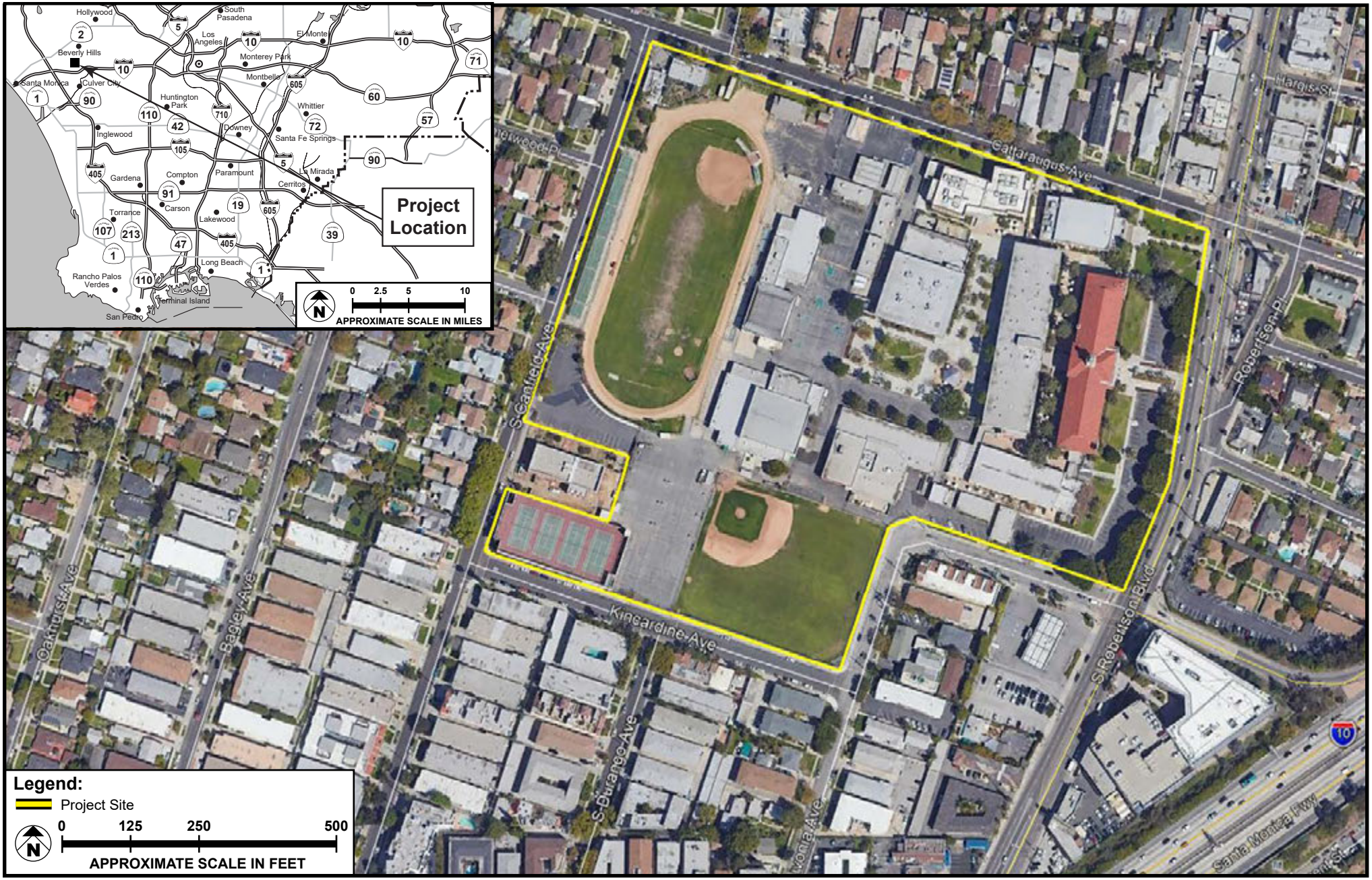
Local

- City Department of Environmental Affairs
- City Department of Planning
- City Department of Recreation and Parks
- City Department of Water and Power
- City Police Department

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to PRC Section 21080.3.1?

One Native American Tribe, the Gabrieleno Band of Mission Indians-Kizh Nation, has requested notification or consultation through the PRC Section 21080.3.1 process on this Project. Please see Chapter XIX. Tribal Cultural Resources for details on the consultation that was done for this Project with California Native American tribes.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.



SOURCE: Google Earth - 2020

FIGURE **1**

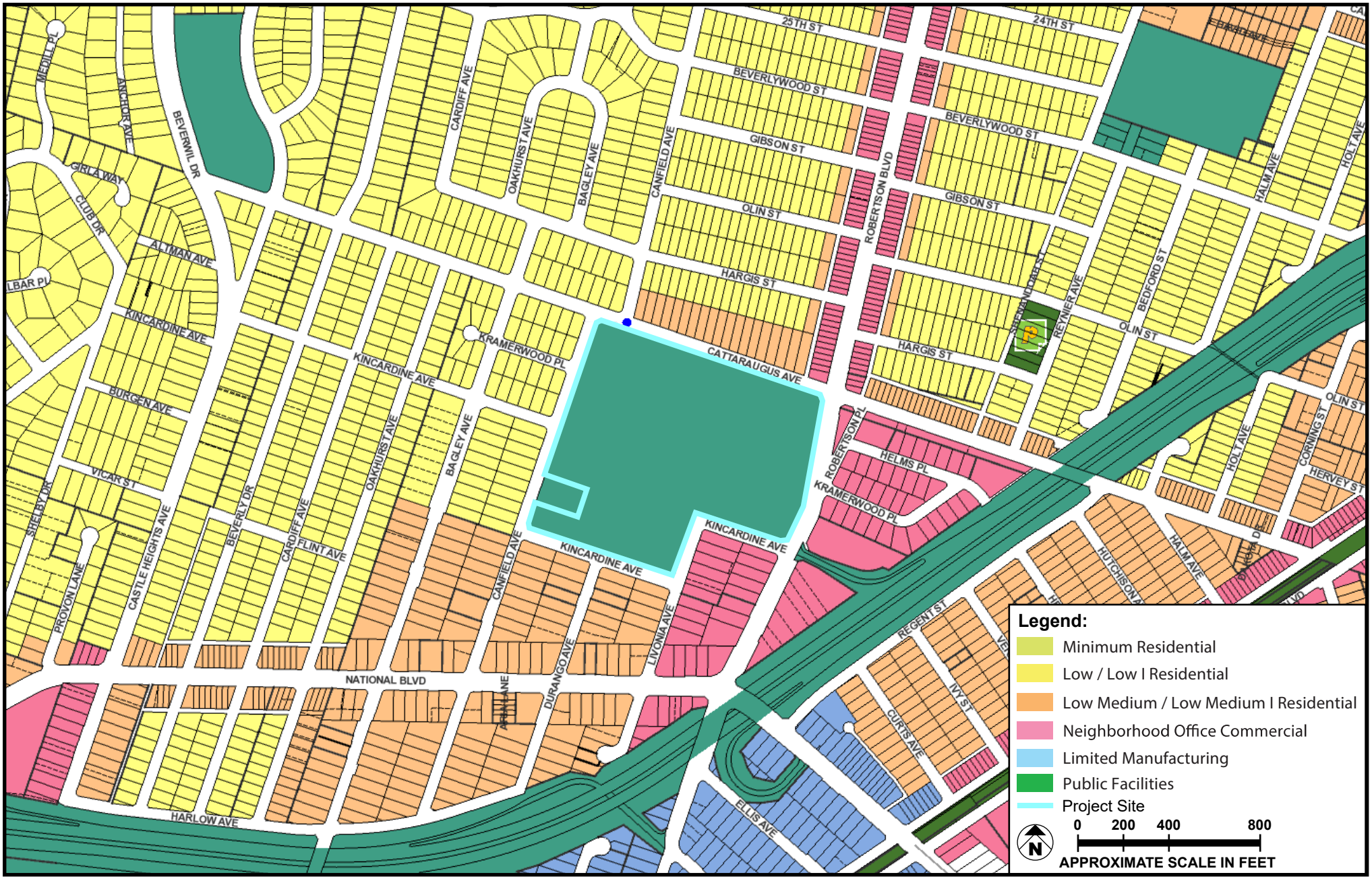
Meridian Consultants

Regional Location Map

276-001-20

2. Environmental Setting

[*This page intentionally left blank.*]



SOURCE: ZIMAS - 2020

FIGURE **2**

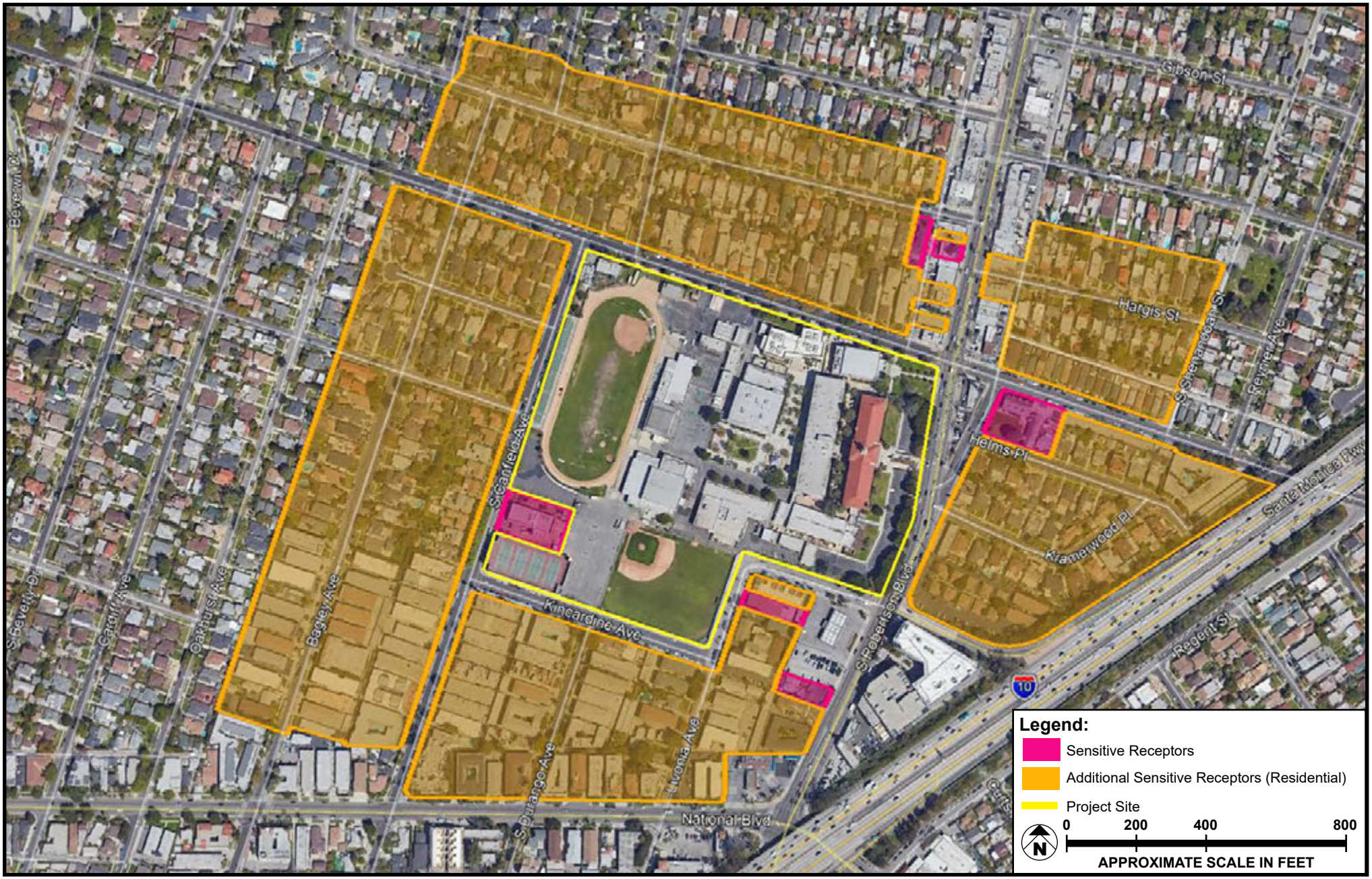
Meridian Consultants

Surrounding Land Use Map

176-001-18

2. Environmental Setting

[*This page intentionally left blank.*]



SOURCE: Google Earth - 2020

FIGURE **3**

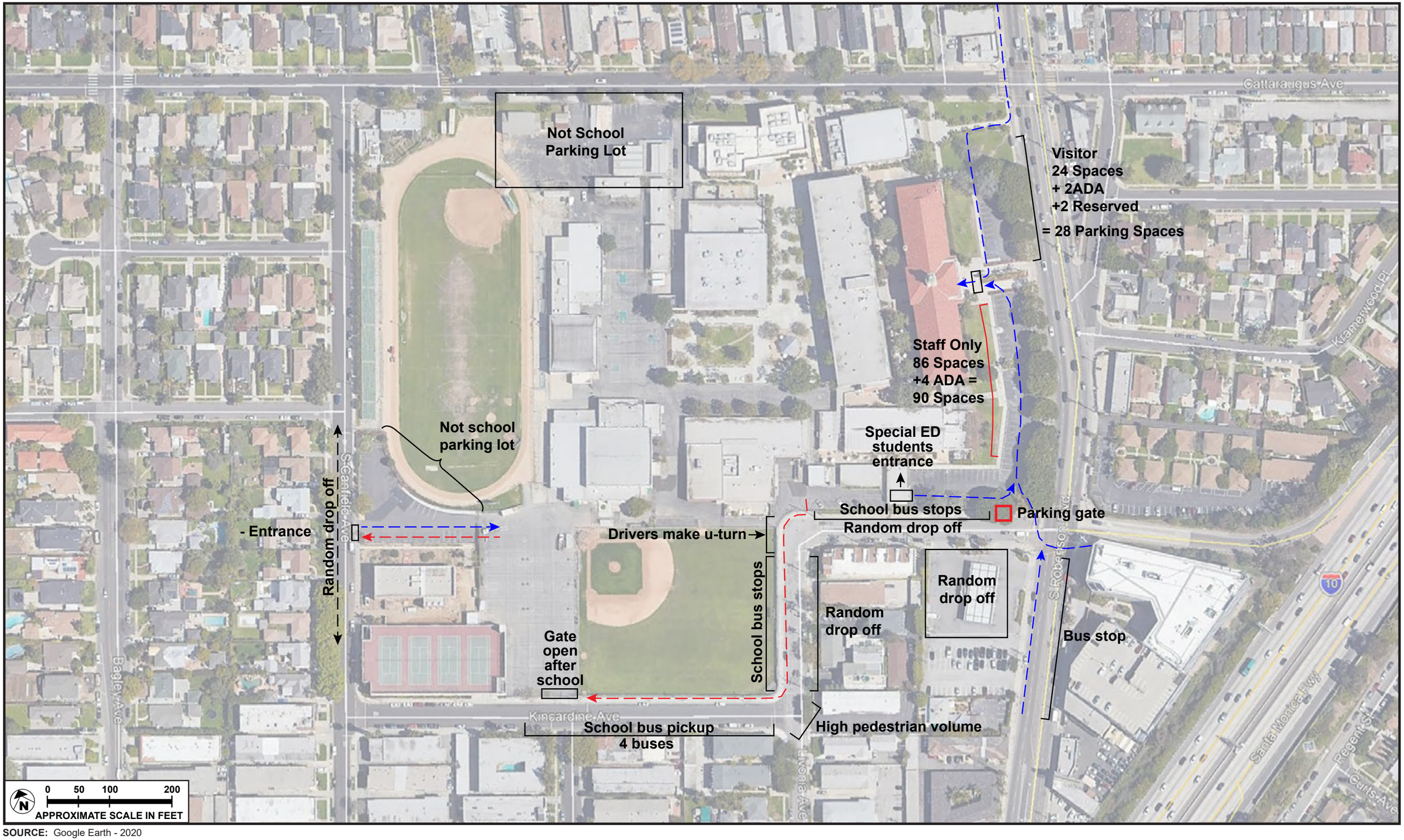
Meridian Consultants

Location of Sensitive Receptors

176-001-18

2. Environmental Setting

[*This page intentionally left blank.*]



SOURCE: Google Earth - 2020

FIGURE **4**

Meridian Consultants

Campus Circulation Site Plan

176-001-18

2. Environmental Setting

[*This page intentionally left blank.*]

3. Project Description

3.1 BACKGROUND

Hamilton HS is located in the community of Castle Heights in the City of Los Angeles. The school has been identified under the LAUSD Board of Education's SUP as one of the schools most in need of critical upgrades and improvements. The goal of the LAUSD SUP is to improve student health, safety, and education through the modernization of school facilities. The core principles of comprehensive modernization project scoping are as follows:

1. The buildings identified to be seismically vulnerable must be addressed. These buildings will be retrofitted, modernized, and/or demolished and replaced depending on the level of effort required to address the seismic vulnerabilities, the historic context the building/site, and the approach that best ensures compliance with DSA requirements.

2. The buildings, grounds and site infrastructure that have significant/severe physical conditions that already do, or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate should be addressed. The broken or failing systems, infrastructure, and/or components in these buildings will be repaired and/or replaced. The comprehensive modernization project will not significantly modernize and update the building as a whole, nor will the project demolish and replace with a new building with a few exceptions. The exceptions to this principle are ancillary buildings such as, but not limited to, lunch shelters, storage units, maintenance and operations (M&O) buildings, and outdated and inaccessible federal buildings.

3. The District school's reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.

4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the Modified Consent Decree.

5. The exterior conditions of the school site will be addressed to improve the visual appearance including landscape, hardscape, and painting.

6. The interior of classrooms and adjacent interior corridors that would otherwise not be addressed will be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatments/blinds and whiteboards.

3.2 PROPOSED PROJECT

The proposed Project involves building replacement, renovation, modernization, and reconfiguration on the Campus of Hamilton HS as part of the SUP. The scope consists of the modernization of the approximately 20.7 acres of the Hamilton HS Campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA educational specifications. Structurally unsound and/or inadequate buildings will be demolished and replaced by new buildings that will improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades including new exterior and interior paint, Internet Protocol (IP) convergence, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements. The Project will reduce the total number of classrooms on the Campus from 111 to 105.

3.2.1 Campus Improvements

The proposed Project would include the changes to the Campus Buildings shown in **Table 2: Proposed Project (Demolition, Remodel, and Construction)** and **Figure 5: Proposed Project site Plan**.

Demolition and Removal

The proposed Project includes the demolition and/or removal of the Lab Building- Building #4, Maintenance and Operations Building- Building #5, Humanities- Building #6, Photography- Building #7, Music Building - Building #11, and several ancillary structures. Modular and relocatable units to be moved within the project includes two unit modular/relocatable buildings- Building #18, #19, #20, #21, #22, and a single-unit relocatable building: Building #23. Additionally, the Project will include the removal of arsenic and lead impacted soil on the Campus that was identified during the preparation of a Preliminary Environmental Assessment-Equivalent report for the Project. The lead and arsenic impacted soil that was identified is currently underneath pavement and, therefore, does not present an exposure risk to students and staff currently on the Campus. The lead and arsenic impacted soil, along with any other soil impacted with chemicals of concern being removed, will be removed in accordance with the Removal Action Workplan (RAW) that will be prepared for the Project.

New Construction

The scope of the proposed Project includes the construction of three new buildings, a central plant and one new lunch shelter. The new buildings consist of a 3-story science, art, and classroom building (Building A), a 2-story library and classroom building (Building B), a 1-story performing arts building (Building C), and a 1-story central plant building. The Project includes a new track and football field and new softball and baseball fields. The new football field, softball field, and baseball fields will also include new field lighting and appurtenant facilities. New construction shall comply with the District's design standards and educational specifications and the District's vision for safe, modern, and adequate educational environments.

The Project will be subject to local, State, and/or federal facilities requirements of the American Disabilities Act (ADA), DSA, and the CDE, as well as all District Standards and Specifications; including those provided

in the LAUSD's SUP Program Environmental Impact Report (Program EIR). Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.

Table 2

Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing SF to Remain
Existing Building to be Demolished/Remodeled/Modernized					
1	Technology Classroom				25,306 SF
2	Assembly Hall/ Auditorium		15,475 SF		
3	Administrative and Classroom		69,270 SF		
4	Lab	87,135 SF			
5	Maintenance and Operations	1,578 SF			
6	Humanities	24,944 SF			
7	Art and Photography	1,718 SF			
9	Cafeteria				13,235 SF
11	Music (B10)	1,845 SF			
12	Arts and Shops				31,445 SF
13	Girls Gym & Locker				18,596 SF
14	Boys Gym & Locker				24,946 SF
18	Two Unit Relocatable	1,730 SF			
19	Two Unit Relocatable	1,730 SF			
20	Two Unit Relocatable	1,730 SF			
21	Two Unit Relocatable/ Drama Room	1,588 SF			
22	Two Unit Relocatable	1,920 SF			
23	Single Unit Relocatable	960 SF			
New Building Construction					
	New Building "A"			80,525 SF	
	New Building "B"			43,760 SF	
	New Building "C"			17,630 SF	
	Outdoor Field Facilities			2942 SF	
	Central Plant			5,400 SF	
	Campus Total* (does not include outdoor space)	**126,878 SF**	**84,745 SF**	**149,173 SF**	**113,528 SF**

Note: All numbers are in sq. ft. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Hamilton HS Comprehensive Modernization Project – Space Program. August 7, 2018.

Current total square footage = Existing + Remodel + Demolition (317,792 sq ft). After project square footage = Existing + Remodel + New (313,655 sq ft). Increase in campus square footage = 4,137 sq ft

Upgrades to Existing Buildings

The scope of the proposed Project includes: seismic upgrades and the comprehensive modernization of the Auditorium and the Administration & Classroom Building; seismic mitigation upgrades, HVAC upgrades, minor improvements, and accessibility upgrades to the Girls Gym and Locker Building and the Boys Gym and Locker Building; seismic mitigation upgrades, minor improvements, and accessibility upgrades to the Cafeteria Building; and minor improvements and programmatic access to the Technology Classroom Building and the Arts and Shops Building.

Site and Technology Improvements

Site Improvements include upgrades to utilities, accessibility, and hard courts. The Project also includes improvements to the landscaping and hardscaping, which are discussed in **Section 3.2.3: Landscaping** below. In addition, the Project includes the following technology improvements in the form of IP Convergence, Fire Alarm upgrades, and supplementary upgrades to existing facilities throughout the Campus.

Site Access, Circulation, and Parking

The Project will alter some of the existing parking lots, add a new parking lot west of the baseball field, and eliminate the senior student parking lot located south of the track and field. The total parking spaces on the Campus are expected to be reduced as a result of the Project. No other significant changes to the site access or the circulation on or surrounding the Campus will occur as a result of the Project.

3.2.2 Interim Housing

Interim housing of students during building construction would be provided in up to 60 portable buildings installed on the baseball field and parking lot in the southern portion of the Campus. These temporary portable buildings would provide all facilities to maintain a fully functional Campus and would be removed following construction of the new buildings and the modernization of the existing buildings.

3.2.3 Landscaping

The proposed Project will include removal and replacement of existing landscaping and hardscaping within the footprint of the campus. All landscaping designs and irrigation systems would comply with LAUSD School Design Guidelines and CHPS criteria would be implemented where appropriate. Plant material would comply with the LAUSD approved plant list and plantings would be placed in order to improve the oil quality and water holding capacity.

A tree survey was conducted for the Project site by Carlberg Associates in March 2018 (see **Appendix B: Arborist Report**). The survey inventoried 168 trees on Campus. While as many existing trees will be preserved as possible, it is probable that some will need to be removed to accommodate implementation of the proposed Project. Any required tree removal activities would follow the procedure outlined in the LAUSD Tree Trimming

and Removal Procedure (Tree Procedure). [24] If impacts to a Protected Tree is unavoidable and removal of the tree is required, a minimum 4:1 replacement ratio would be required, which is consistent with the City' replacement mitigation ratio. New canopy and accent trees would be installed to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus.

See **Appendix B** for the location of all existing trees on Campus.

3.2.4 Construction Phasing and Equipment

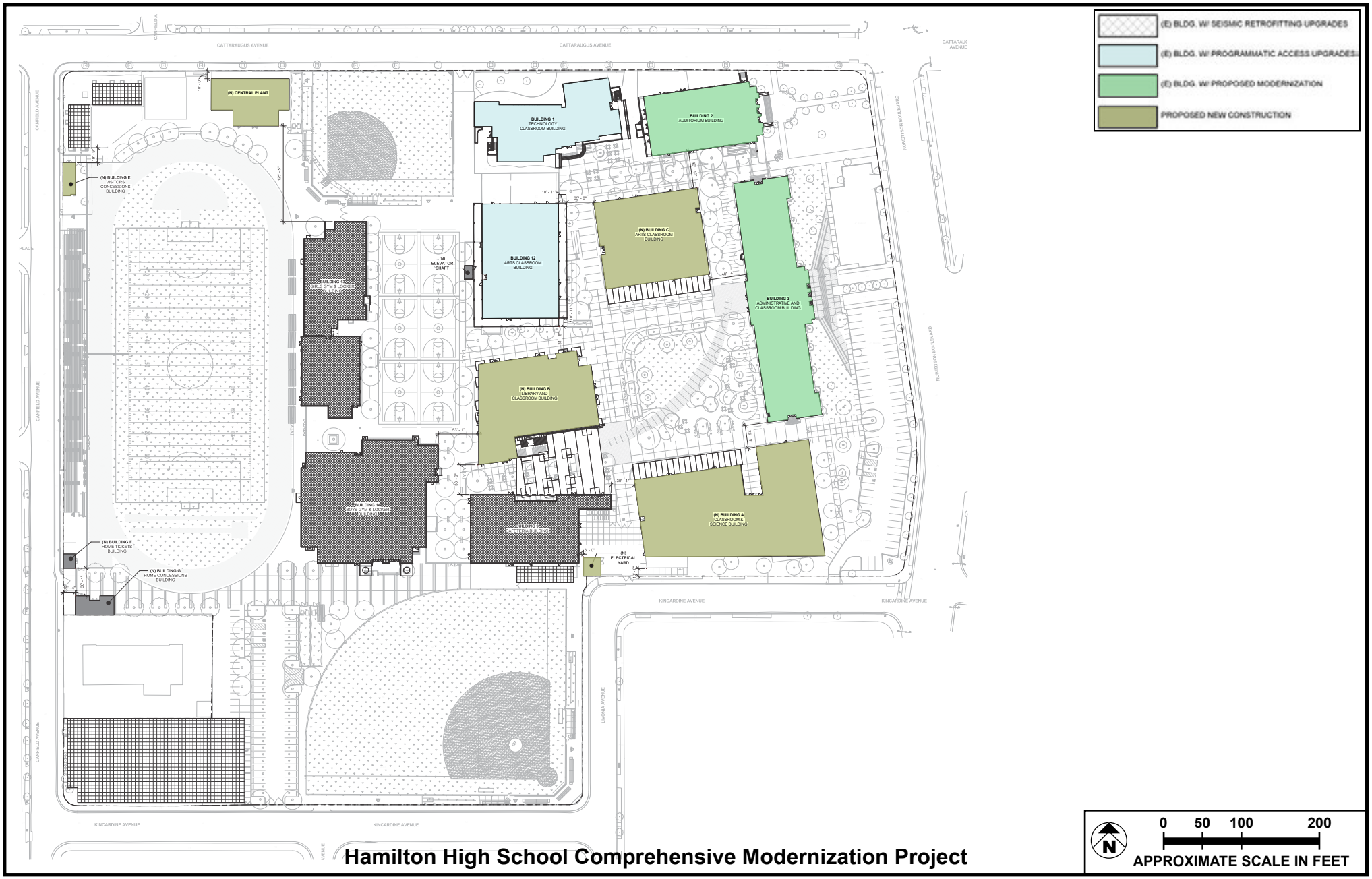
Construction is planned to start in the first quarter (Q1) 2022, heavy construction would end by the second quarter (Q2) in 2028 and be fully completed by fourth quarter (Q4) of 2027 (approximately six years and three months). **Table 3: Construction Schedule and Equipment** summarizes the proposed construction activities and schedule for implementation of the proposed Project.

[24] All tree trimming and removal conducted on District property is required to adhere to the procedures described in the *LAUSD OEHS Tree Trimming and Removal Procedure*. Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies while ensuring the protection of breeding and nesting habitat of protected birds. Written approval from the Director of OEHS, Director of Maintenance & Operations, Local District Superintendent, and School Principal is required before any protected tree is relocated or removed. For more information, please contact OEHS at (213) 241-3199 or the District Arborist at (213) 745-1422. Further information may be accessed on LAUSD's website: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD percent20Tree percent20Trimming percent20Removal percent20Procedure.pdf.

Table 3

Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Demolition	*Q1 to Q4 2022 and Q3 to Q4 2024*	Excavators w/breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips; average 10 CY end-dump trucks	10
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers	2
Grading	*Q3 2022 to Q2 2023 and Q3 2024 to Q2 2025*	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1
		Water Truck	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95 percent soil compaction)	2
		Trencher / Excavator	1
		Concrete Trucks	5
Building Construction	Q3 2022 to Q2 2028	Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Forklifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Water Truck	1
Building Interiors	Q2 2028 to Q2 2030	Air Compressor	1
Asphalt Paving	Q2 2030 to: Q3 2031	Skip Loaders	2
		Roller	1
		Paver	1
		Asphalt Trucks	8
		Water Truck	1



Hamilton High School Comprehensive Modernization Project

SOURCE: LPA Design Studios - Jan 2020

FIGURE **5**

Meridian Consultants

Proposed Project Site Plan

176-001-18

3. Project Description

[*This page intentionally left blank.*]

4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology & Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology & Water Quality
- ☐ Land Use & Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Pedestrian Safety
- ☐ Population & Housing
- ☐ Public Services
- ☒ None
- ☐ Recreation
- ☐ Transportation & Traffic
- ☐ Tribal Cultural Resources
- ☐ Utilities & Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance
- ☐ None with Mitigation Incorporated

DETERMINATION

On the basis of this initial evaluation:

☒ I find that the proposed Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature	Date
Carlos A. Torres	CEQA Officer for LAUSD
Printed Name	Title

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the Statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in PRC section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AE-2:	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. School Design Guide This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3:	LAUSD shall assess a proposed Project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-4	LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1. **Marquee Signs Bulletin BUL-5004.1** This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.
SC-AE-5:	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.

LAUSD Standard Conditions of Approval	
	School Design Guide This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.
SC-AE-6:	The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to: • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

a) Have a substantial adverse effect on a scenic vista?

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance.[25] Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.[26] The Project site and surrounding area are flat and developed with urban land uses. Views from the development are limited to surrounding residences and transited streets. Additionally, Project development would not obscure these views. The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas.[27] No impact to scenic vistas would occur. No mitigation measures or further study is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. The nearest designated State scenic highway to the site is State Route 27 (SR-27; Topanga Canyon State Scenic Highway) about 11 miles to the west of the Project and designated scenic highway portion of SR-2 is located approximately 18 miles northeast of the Project.[28] The proposed structures associated with the Project would not be visible from any designated State scenic highway. Project development would not result

25 *LA CEQA Thresholds Guide*, "Chapter A," 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf.

26 *LA CEQA Thresholds Guide*, "Chapter A," 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf.

27 *LA CEQA Thresholds Guide*, "Chapter A," 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf.

28 California Scenic Highway Mapping System, March 11, 2020. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

in impacts to scenic resources within a designated State scenic highway. No impact to scenic resources would occur. No mitigation measures or further study is required.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant. Visual quality is a measure of the overall impression or appeal of an area as determined by the particular landscape's characteristics and scenic resources. It is possible for new structures to be compatible with the existing setting if they replicate existing forms, lines, colors, and textures of the surrounding environment and if the new structures do not appreciably change the balance of natural elements. The proposed Project is located in an urbanized area and would not conflict with any zoning and other regulations governing scenic quality.

The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide and SC AE-3 into site-specific project design for the protection of character and quality of site surroundings.[29,30]

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the project vicinity are limited to the residential uses adjacent to the southern, eastern, western and northern site boundaries. Impacts from shadows would be different than current conditions, due to the construction of 3 new classroom buildings, two of which would be three stories in height and one will be a one-story building. However, due to its location on the Project site, it would not be expected to cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. There would be no new shade impacts to sensitive uses on the northern side of the site, across from the existing main entrance. Compliance with **SC-AE-5** would ensure shade and shadow impacts are analyzed and mitigated. No significant impacts from shadows would occur as a result of the project.

With implementation of **SC-AE-3**, impacts to the visual character or quality of the site and its surroundings would be less than significant. No mitigation measures or further evaluation are required.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

29 *School Upgrade Program FEIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.
30 *School Upgrade Program FEIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.

The Project site is in an urban setting and is fully developed. The current uses generate nighttime light from security and parking lot lights, exterior building lights, and portable lights that are occasionally brought on Campus to light evening athletic events. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and exterior building security lights.

Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. **SC-AE-6** adherence of limiting light and glare impacts to no more than two foot-candles to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses.[31] Methods such as the use of light hoods, filtering louvers, glare shields, and/or landscaping as well as painting lamp enclosures and poles to reduce reflection should be implemented to prevent excessive light and glare.[32]

The Project includes new lighting for the new track and football field and new softball and baseball fields. The Project also includes installation of pedestrian lighting within campus grounds which would adhere to the foot-candle requirement with regard to spacing.[33] The field lighting would only be used during the nighttime and would be angled towards the field as to enhance visibility without interfering with driver/road visibility. Substantial glare as a result of field lighting is not expected. Therefore, implementation of the Project improvements would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the project area.

Additionally, the exterior of the new buildings would be constructed of nonreflective building materials so vehicle headlights would not reflect glare for drivers. Moreover, under 41.40 LAMC, all construction would be limited to allowable construction noise time designated by the City.[34]

With respect to all SUP projects, the Program EIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and **SCs AE-4, AE-5**, and **AE-6** to ensure that site lighting would have minimal off-site impacts.[35,36]

The Project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the project would have no impact on nighttime views. With implementation of the required measures from the LAUSD School Design Guide and **SCs AE-4**, **AE-5**, and **AE-6**, light and glare impacts would be less than significant. No mitigation measures or further evaluation are required.

31 *School Upgrade Program FEIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.
32 *School Upgrade Program FEIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.
33 LPA, *Basis of Design Narrative-Final Schematic Design Documents: Alexander Hamilton High School*, November 4, 2019.
34 Los Angeles Police Department, "Noise Enforcement Team," Accessed March 11, 2020. http://www.lapdonline.org/special_operations_support_division/content_basic_view/1031.
35 *School Upgrade Program EIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.
36 *School Upgrade Program EIR*, 2015. Accessed March 11, 2020. http://achieve.lausd.net/ceqa.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to nonforest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to nonforest use?	☐	☐	☐	☒

Explanation:

There are no Agriculture And Forestry Resources LAUSD SCs that apply to this Project.

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. The proposed Project is located within a developed and highly urbanized area. According to the California Department's "Los Angeles County Important Farmland 2018" map, the project is not designated as farmland.[37] The Project site is identified as "Other Land" which is defined as land not included in any other mapping category. No farmland or agricultural activities exist on or near the Project site. Additionally, the site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impacts to farmland or agricultural resources would occur.

37 California Department of Conservation Division of Land Resource Protection, Farmland Mapping and Monitoring Program, https://maps.conservation.ca.gov/dlrp/ciftimeseries/

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. The Project site is zoned PF-1 and is designated a Public Facilities area in the Exposition Corridor Transit Neighborhood Plan. The Project site is not zoned for agricultural production, and as referred to in threshold (a), there is no farmland on the site. Additionally, no Williamson Act contracts are in effect for the Project site.[38] No impact to land zoned for agricultural use or subject to a Williamson Act would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The Project site is zoned PF-1 and is designated as Public Facilities in the Exposition Corridor Transit Neighborhood Plan. The Project site is not zoned as forestland or timberland, and there is no timberland production at the Project site. No impacts would occur.

d) Result in the loss of forest land or conversion of forest land to nonforest use?

No Impact. As referred to in threshold (c), the Project site is not zoned as forestland. Although there is some landscaping on the Project site in the form of trees and bushes, no designated forested lands exist on or near the Project site. The closest forestland to the Project site is Angeles National Forest, which is approximately 60 miles north of the site. Therefore, no impacts to forestland would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use?

No Impact. As referred to in **Section 2.2: Surrounding Land Uses**, the existing land uses surrounding the Project site is composed of single-, multifamily residential, mixed-use commercial, and other commercial uses. Neither the Project site nor nearby properties are currently utilized for agricultural or forestry uses. The Project site is not classified in any Farmland category designated by the State of California. For a visual representation of the surrounding land uses please refer to **Figure 2**. No impacts would occur.

38 State of California Department of Conservation, https://www.conservation.ca.gov/dlrp/fmmp/Pages/Maps-and-Data.aspx

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Are significance criteria established by the applicable air district available to rely on for significance determinations?		☒ Yes		☐ No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Explanation:

An Air Quality Study has been completed for the proposed Project and is included in **Appendix A: Air Quality Study**.

LAUSD has SCs for minimizing impacts to air quality. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and nonpermitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with '**Air Toxics Health Risk Assessment (HRA)**'. This document includes guidance on HRA protocols for permitted, nonpermitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site. The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict nonessential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <u>Fugitive Dust</u> • Apply nontoxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.

LAUSD Standard Conditions of Approval	
	• Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site. • Enclose, cover, water twice daily, or apply nontoxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5 percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day <u>General Construction</u> • Use ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by SCAQMD, is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.[39]

Air quality regulatory setting, meteorological conditions, existing ambient air quality in the project vicinity, and air quality modeling is included as **Appendix A** to this Initial Study/ND.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A project would have a significant impact if it conflicts with or delays implementation of the applicable air quality management plan (AQMP). The Project site is located within the South Coast Air Quality Management Plan (SCAQMP) jurisdictional area.

The Project would not jeopardize the attainment of air quality standards in the 2016 AQMP for the SCAQMP and the Los Angeles County portion of the South Coast Air Basin through the compliance with **SC-AQ-4**, which requires the implementation of all feasible measure to reduce air emissions below the SCAQMD regional

39 Area Designations Maps / State and National. August 22, 2014. Accessed October 01, 2018. http://www.arb.ca.gov/desig/adm/adm.htm.

and localized significance thresholds. Moreover, **Table 4: Unmitigated Maximum Regional Construction Emission** and **Table 7: Unmitigated Localized Construction Emissions** show the Project would not exceed the significance thresholds for construction or operational emissions with the implementation of LAUSD SCs and compliance with Federal, State, and local air quality plans. The Project would also not exceed the screening criteria for the localized significance thresholds. Without exceedances to the threshold, the Project would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Based on the requirements of the Program EIR, the Project is not regionally significant and therefore, would not warrant a review by the Southern California Association of Governments (SCAG).[40]

With the implementation of **SC-AQ-4** and compliance with all existing Federal, State, and local air quality plans, regulations, and programs, the proposed Project would have a less than significant impact to the implementation of the applicable air quality plan. No mitigation measures or additional studies are required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Less Than Significant Impact. Construction has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers, haul trucks, and construction material delivery trucks traveling to and from the Project site. Construction activities would involve the demolition and removal of existing uses, the transport and disposal of these materials and soil, and construction of new structures and related infrastructure. Fugitive dust emissions would result from demolition and construction activities and mobile source emissions would result from the use of haul trucks and on-site construction equipment such as dozers, loaders, and cranes. During the finishing phase of a building, paving operations and the application of architectural coatings (e.g., paints) and other building materials would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity (e.g., construction schedule), the specific type of operation and, for dust, the prevailing weather conditions.

Construction activities would cause short-term emissions of criteria air pollutants. The primary source of NOX, CO, and SOX emissions is the operation of construction equipment. The primary sources of particulate matter (PM10 and PM2.5) emissions include activities that disturb the soil, such as grading and excavation, as well as building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

The emission levels in **Table 4** represent the maximum daily emissions projected to occur taking into consideration all of the construction phases. As presented in **Table 4**, the unmitigated daily maximum regional construction emissions would not exceed the SCAQMD daily significance thresholds for VOC, NOx, CO, SO2, PM10, and PM2.5. Therefore, regional construction would not result in potentially significant short-term regional air quality impacts during construction. Impacts would be less than significant.

40 *School Upgrade Program EIR*, 2015. Accessed March 19, 2020. http://achieve.lausd.net/ceqa.

Table 4

Unmitigated Maximum Regional Construction Emissions

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Year 2022	11	89	85	<1	6	4
Year 2023	7	57	61	<1	4	3
Year 2024	7	58	60	<1	5	3
Year 2025	4	31	38	<1	3	2
Year 2026	2	17	22	<1	2	1
Year 2027	2	17	21	<1	2	1
Year 2028	4	17	21	<1	2	1
Year 2029	4	1	2	<1	<1	<1
Year 2030	6	7	14	<1	1	<1
Year 2031	2	6	11	<1	<1	<1
Maximum	11	89	85	<1	6	4
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: CalEEMod.

Notes:

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Refer to **Attachment A.3 (Proposed Summer)** and **Attachment A.4 (Proposed Winter)**, Sections 3.2 through 3.7, for maximum on-site plus off-site emissions during both the summer and winter seasons.

Operational Emissions

Operational air quality impacts are assessed based on the incremental increase in emissions compared to existing conditions. The results of these net calculations are compared to the associated SCAQMD thresholds presented in **Table 5: Unmitigated Maximum Regional Operational Emissions**. The Project would replace and upgrade facilities on the Campus, but it will not increase the number of students or faculty and would not introduce major new emission sources. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. As shown in **Table 5**, the proposed Project would not exceed the regional daily significance thresholds for VOC, NOx, CO, SOx, PM10, and PM2.5 prior to mitigation and would result in less than significant impacts.

Table 5

Unmitigated Maximum Regional Operational Emissions

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
	pounds/day					
Area	7	<1	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	4	20	57	<1	26	7
Total	12	21	57	<1	26	7
Existing	14	35	101	<1	26	7
Net Total	—	—	—	—	—	—
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: CalEEMod.
Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
Refer to **Appendix A: Attachment A.5 (Operational Summer)** and **Attachment A.6 (Operational Winter)**, Section 2.2, for maximum operational emissions during both the summer and winter seasons.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. During construction, sensitive receptors could be exposed to a variety of emissions including those from construction equipment. On-site emissions have the potential to expose nearby sensitive receptors to harmful pollutant concentrations. For a list of sensitive receptors surrounding the Project site, please refer to **Table 1**. For a visual representation of the locations of sensitive receptors please refer to **Figure 3**.

Construction Localized Significance Thresholds

SCAQMD developed Localized Significance Thresholds (LSTs) to determine if emissions of NO2, CO, PM10, and PM2.5 generated at a Project site (off-site mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants.[41]

Construction has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers, haul trucks, and construction material delivery trucks traveling to and from the Project site. The assessment of construction air quality impacts considers each phase of the construction and the equipment potentially used. Construction emissions can vary substantially from day to day, depending on the level of activity (e.g., construction schedule), the specific type of operation and, for dust, the prevailing weather conditions.

The results of the construction LST analysis are provided in **Table 6: Unmitigated Localized Construction Emissions**. As shown in **Table 6**, the unmitigated emissions would not exceed the localized significance construction thresholds. Construction would be required to comply with the SCAQMD's Rule 403 (Fugitive Dust), which requires watering of the site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing trackout dust from construction vehicles. These measures would further reduce localized construction related emissions.

Table 6

Unmitigated Localized Construction Emissions

Source	NOx	CO	PM10	PM2.5
	On-Site Emissions (pounds/day)			
Construction				
Total maximum emissions	42	37	2	2
LST threshold	172	1,073	8	5
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
The net area/energy emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
Refer to **Appendix A: Attachment A.3 (Proposed Summer)** and **Attachment A.4 (Proposed Winter),** Sections 3.2 through 3.7, for maximum on-site emissions during both the summer and winter seasons.

Construction Emission Health Risk

Whenever a project would require 1) the use of chemical compounds that have been identified in SCAQMD Rule 1401, 2) the use of chemical compounds placed on CARB's air toxics list pursuant to Assembly Bill 1807

41 *School Upgrade Program EIR*,2015. Accessed March 19, 2020. http://achieve.lausd.net/ceqa.

(AB 1807), Air Contaminant Identification and Control Act (1983), or 3) the use of chemical compounds placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, an HRA is required by the SCAQMD.

Toxic Air Contaminants (TACs)

Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. During construction, sensitive receptors could be exposed to a variety of emissions including those from construction equipment. However, due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction.

Carbon Monoxide Hotspots

Construction of the proposed Project would not increase traffic or vehicle trips due to the fact that facility operations would not increase as compared to existing conditions. Additionally, the Project would not exceed any localized significance thresholds including localized CO emissions. Because traffic impacts would not worsen and CO emissions would not significantly increase, the Project would not create a potential CO hotspot at any of the study intersection. Therefore, there would be no increased emissions of CO from the proposed Project and therefore this impact would be considered less than significant.

The proposed Project will not result in an increase in traffic at local intersections, therefore, the potential for creation of carbon monoxide "hotspots" would be negligible. CO hotspots were omitted from this analysis due to its negligible impact to the finding of this Project.

Operation Localized Significance Thresholds

The Project would be required to comply with the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a Statewide green building standards code and is applicable to residential and nonresidential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

As discussed in **Table 5**, prior to mitigation efforts, criteria pollutant thresholds would not result in a significant impact. Localized operational air quality impacts are assessed based on the incremental increase in emissions compared to existing conditions. The results of the net operational LST analysis are compared to the localized operational emissions thresholds and provided in **Table 7: Unmitigated Localized Operational Emissions**. **Table 7** shows localized net operational emissions would also not exceed the localized significance operational thresholds.

With the implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO, NOx, PM10, and PM2.5. Operational emissions associated with the proposed Project would likely be slightly less than the emissions currently occurring within the existing

school due to a decrease in energy usage associated with the new building that will be designed and built to meet the most current Title 24 building energy standards and the LAUSD CHPS program that would result in a much more energy efficient structure than the existing portables to be removed.

Table 7

Unmitigated Localized Operational Emissions

Source	NOx	CO	PM10	PM2.5
	On-Site Emissions (pounds/day)			
Operational				
Project area/energy emissions	1	1	<1	<1
Existing area/energy emissions	1	1	<1	<1
Net total area/energy emissions	—	—	—	—
LST threshold	172	1,073	4	1
Threshold Exceeded?	No	No	No	No

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
The net area/energy emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
Refer to **Appendix A: Attachment A.5 (Operational Summer)** and **Attachment A.6 (Operational Winter),** Sections 3.2 through 3.7, for maximum on-site emissions during both the summer and winter seasons.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

During construction, the proposed Project would require earth moving activities and construction equipment that may potentially introduce low levels of odors. However, with the incorporation of **SC-AQ-2** and **SC-AQ-4** the contractors are required to keep the equipment properly tuned up which would reduce harmful emissions and odors. In addition, **SC-AQ-4** also requires measures to keep exhaust emissions and fugitive dust levels low. With the incorporation of these SCs, construction emissions are expected to have a less than significant adverse impact on a substantial number of people.

The operation of the proposed Project is expected to have no impact on a substantial number of people since the operational emissions of the Project is expected to be less than the existing operational emissions with reduced classroom capacity and new, more efficient facilities installed. The functional nature of the Project-an educational facility- is also not expected to produce odors during its operation. Therefore, the operational emissions are not expected to adversely affect a substantial number of people. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

Explanation:

An Arborist Report has been completed for the proposed Project and is included in **Appendix B**.

LAUSD has SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-BIO-1	An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the Project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: • United States Fish and Wildlife Service (USFWS) • National Marine Fisheries Services (NMFS) California Department of Fish and Wildlife (CDFW) • California Native Plant Society (CNPS) County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases. • California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory

LAUSD Standard Conditions of Approval

- Local Audubon Society
- Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
- California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with Project sites.

Biological Resources Report

If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.
- Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be outlined. If on-site measures are not feasible or would not be biologically viable, off site measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:
    - Location of the mitigation site.
    - Plant species to be used, container sizes, and seeding rates.
    - Schematic depicting the mitigation area.
    - Planting schedule.
    - Irrigation method.
    - Measures to control exotic vegetation.
    - Specific success criteria.

LAUSD Standard Conditions of Approval	
	○ Detailed monitoring program. ○ Contingency measures should the success criteria not be met. ○ Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. LAUSD shall consult with the US Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats
SC-BIO-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under **SC-AE-6**.
SC-BIO-3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates2) should occur outside of nesting season to avoid take of birds, bats, or their eggs.3 Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat • For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., Project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies. • If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination. • If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds. • If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. • A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation and shall notify LAUSD immediately if project activities damage avian nests. Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses • If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area. • The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager. • If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.

LAUSD Standard Conditions of Approval	
	• The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager. • No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Bat Surveys • Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings. • Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project. • If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. • Mitigation measures shall be determined on a project-specific basis and may include: o Avoidance o Humane exclusion prior to demolition • Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality • Bats should be flushed from trees prior to felling or trimming. o Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
SC-BIO-4	LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus: **New Construction in Native Habitat** LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required: • **Translocation of rare plants is prohibited in most instances.** CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. • **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • **Creation of woodlands.** Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. o All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. o Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. o Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.

LAUSD Standard Conditions of Approval	
	Removal of Protected Trees on Existing Campuses LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. The Project site is a fully developed area that contains no native vegetation capable of supporting any special status plant or wildlife species. No known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian, or wetland habitats exist on the Project site. The Project site is not designated as a critical habitat for threatened and endangered species.[42] The Project site and its surrounding area is not mapped within a Significant Ecological Area (SEA).[43] No impact would occur.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the US Fish and Wildlife Service?

No Impact. The Project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations by the CDFW or USFWS.[44,45] The Project site is entirely developed and does not contain any natural drainage or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. No impact would occur.

c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. There are no protected wetlands within or adjacent to the Project site.[46] Therefore, no impact to wetlands would occur through direct removal, filling, hydrological interruption, or other means.

42 USFWS, *Mapping for Critical Habitat for Threatened and Endangered Species*, Available at: https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77. Accessed March 10, 2020.

43 DPR, "Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map." Web. 2015. http://planning.lacounty.gov/sea/information

44 DPR, "Chapter 9: Conservation and Natural Resources Element." http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf.

45 DPR, "Figure 9.2: Regional Habitat Linkages," 2014. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf

46 USFWS, *National Wetlands Inventory*. https://www.fws.gov/wetlands/data/Mapper.html

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. The Project site does not contain any water sources or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly wildlife corridors. Therefore, the proposed Project would have no impact on the movement of any wildlife species or impede the use of migratory wildlife corridors.

Tree removal and building demolition have the potential to disrupt birds that are nesting in the trees or buildings during breeding season (February 1 through August 31). Construction related noise and vibration also have the potential to disrupt birds during the avian breeding season. Therefore, construction activities (including demolition) have the potential to impact nesting birds. However, the proposed Project would implement **SC-BIO-3**, as necessary. Following the completion of a pre-construction clearance survey, the implementation of measures provided in **SC-BIO-3** would reduce impacts to less than significant. These measures include commencing tree removal and demolition activities outside of avian nesting season. Additionally, the Project would also adhere to the requirements outlined in **SC-BIO-1**, **SC-BIO-2**, and **SC-BIO-4**. Therefore, impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The Project site is located in a fully developed area and its surrounding development is not mapped within a Significant Ecological Area (SEA).[47] The Project site contains trees for landscape fronting throughout the Hamilton campus that are considered significant character defining features of the Project site.

Construction of the proposed Project may require the removal of street trees and trees on site. The proposed Project would include a landscape plan to offset the loss of trees on the Project site. All recommendations contained in the project-specific Arborist Tree Report prepared by an LAUSD Tree Maintenance Personnel Certified Arborist are incorporated into the proposed Project during construction. Replacement trees would be planted at the appropriate size at maturity for the space, and would be selected from the LAUSD Approved Plant List.[48] The Project will comply with LAUSD's Tree Procedure for trees on the Campus and will complete the City's tree removal permit process if any street trees are removed. If impacts to a Protected Tree is unavoidable and removal of the tree is required, a minimum 4:1 replacement ratio would be required, which is consistent with the City' replacement mitigation ratio. Additionally, the LAUSD Tree Procedure encompasses all requirements of the City and would not conflict with any local policy or ordinances. Therefore, this would result in less than significant impacts of the proposed Project conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant and no further analysis is required.

47 DPR, "Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map,"2015. http://planning.lacounty.gov/sea/information

48 LAUSD, *LAUSD Approved Plant List*, 2012, https://www.laschools.org/documents/download/green_spaces percent2fseeds percent2fUpdated_Plant_List.pdf

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The Project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or Sate habitat conservation plans.[49] The Project site is not located on or near any SEA, Land Trust, or Conservation Plan.[50] Therefore, no impact would occur.

49 CDFW, *California Regional Conservation Plans,* 2019. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, Accessed February 18, 2020

50 DPR, "Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map," 2015. http://planning.lacounty.gov/sea/information.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Explanation:

A Historic Resource Evaluation Report and a Historic Resources Technical Report has been completed for the proposed Project and is included in **Appendix C: Historic Resource Evaluation Report** and **Appendix D: Historic Resources Technical Report**.

LAUSD has SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under **SC-CUL-7**.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the Project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans

LAUSD Standard Conditions of Approval	
	○ At what soil depths monitoring of earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resources would be materially impaired.[51] Section 15064.5 of the State CEQA Guidelines defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resources survey meeting certain State guideline; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, education, social, political, military, or cultural annals of

51 *CEQA Guidelines*, section 15064.5 (b)(1).

California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. In terms of significant impacts, according to CEQA Guidelines Section 15064.5 (b)(3), a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995, revised 2017), Weeks and Grimmer, shall be considered as mitigated to a level of less than significant impact on the historical resource.

As previously mentioned, the Project would include the demolition of Classroom Building 1 and 2, the covered lunch shelter area, and several utilitarian buildings. None of these buildings are listed in the California Registrar as contributors to the Alexander Hamilton HS campus historic district.[52] The 2018 LAUSD Historic Resource Evaluation Report determined these buildings are not individually eligible for designation at the national, State, or local levels and do not contribute to the Alexander Hamilton High School historic district.

The Project would alter two existing buildings that are considered contributors to the Alexander Hamilton HS campus historic district: The Administrative Building and the Assembly Building. The Administrative Building and the Assembly Building are both Northern Italian Renaissance Revival in style and share similar materials and characteristics including symmetrical composition, patterned brick veneer, and Classical terra cotta architectural ornamentation. Both buildings are listed in the California Register as contributors to the campus historic district and were found individually eligible for listing in the National and California Registers. In addition, the Department of Water and Power Distributing Station #20 (DWP Distributing Station #20) adjacent to the proposed Project on S Canfield Avenue was found eligible for listing in the National Register and California Register in the evaluation of SurveyLA, the Los Angeles Historic Resources Survey. These buildings are considered presumptive historical resources as defined by CEQA.

Alterations are needed in order to comply with ADA requirements, provide seismic upgrades, remove barriers, and meet the programmatic needs of the school. Alteration to the Administrative Building will include a new accessible ramp to the existing main entrance and reconfiguration of the interior office and classroom layout. The new ramp will overlay a small portion of the existing staircase to the south side of the main entrance, immediately adjacent to the building wall and will be minimal in size and of simple design. The original steps will remain mostly intact, and the main entrance will retain its overall configuration and historical appearance. The layout of the offices and classrooms will be reconfigured, but the Administrative Building will retain the overall interior configuration of lobby staircases, and double-loaded corridors. The main first-floor corridor will be secured from the lobby with a new glass partition, but the visual relationship between the two spaces will be retained and the inserted partition will be reversible. The third-story floor inserted into the original library on the second floor will be removed and the space restored to its original two-story volume.

Substantial alteration to the Assembly Building's interior will be required to accommodate for the seismic upgrade, improve acoustics, and meet accessibility requirements. The seismic upgrade is concentrated on the interior to avoid incompatible alterations to the building's exterior. It includes installing pairs of steel columns flanking each existing pilaster, connected by steel beams below the window sills. The interior wall surface will

52 Historic Resources Group, *Los Angeles Hamilton High School Comprehensive Modernization Project*, "Historical Resources Technical Report." July 2020.

be furred to conceal the inserted frames, thus also concealing the existing pilasters. The potential for retrofitting suspended coffered ceilings has been considered, however, it has been determined that it is not technically or economically feasible to retrofit the coffered ceilings which is seismically unstable and acoustically insufficient. The coffered ceilings would be replaced by new ceiling of curved gypsum board panels to improve acoustics and conceal lighting. An acoustical screen of perforated wood panels will be added at the rear of the house. The stage extension, and the angled walls flanking the proscenium will be removed and rebuilt to provide space for an accessible lift to provide access to the stage. These interior changes to the auditorium are necessary to meet programmatic and structural requirements while leaving majority of the building intact. The configuration of the Assembly Building would remain largely intact as well and the historic configuration and spatial relationships of the lobby, auditorium, and stage will remain.

Alterations at the Administrative Building and the Assembly Building, along with new proposed constructions and demolitions were evaluated against The Secretary of the Interior's Standards for Rehabilitation, taking into account technical and economic feasibility and was determined to meet the Secretary of the Interior's Standards for Rehabilitation. In accordance with CEQA Guidelines Section 15064.5(b)(3), the Project is considered to have a less than significant impact on the Alexander Hamilton High School Historic District, the Administrative and Assembly Buildings, and the adjacent DWP Distributing Station #20. No mitigation measures would be required.[53]

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact. Section 15064.5 of the State *CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

Soil on site is highly disturbed by construction of the existing and previous developments. Per **SC-CUL-6**, an archeological program will be established as it pertains to the discovery of archeological resources, although, discovery is highly unlikely. Moreover, as part of the Project, **SC-CUL-7** through **SC-CUL-10** require the halting of work within a 30-foot radius in the event of a historical or unique archaeological resource discovery during construction activities. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resources uncovered. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

If archaeological resources are discovered, **SC-CUL-10** would be implemented for handling and recovery. With the incorporation of **SC-CUL-6** to **SC-CUL-10**, archaeological impacts would be less than significant.

53 Historic Resources Group, *Los Angeles Hamilton High School Comprehensive Modernization Project*, "Historical Resources Technical Report." July 2020.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. During previous construction of the Campus, extensive earthwork (excavation and grading) occurred; therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy: Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a State or local plan for renewable energy efficiency?	☐	☐	☒	☐

Explanation:

The Program EIR has determined that projects implemented under the SUP would result in less than significant impacts to energy with the applicable SCs outlined. Applicable SCs related to energy impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide.** Establishes a minimum nonhazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. **Construction & Demolition Waste Management.** This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight.
SC-USS-2	LAUSD shall coordinate with the City Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.

LAUSD Standard Conditions of Approval	
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multipurpose rooms.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact.

Existing Condition

Electricity

Electricity to Hamilton HS is provided by Los Angeles Department of Water and Power (LADWP). LADWP supplies over 26 million megawatt hours of electricity a year to the City' approximately 1.4 million users. LADWP is the largest municipal electric utility in the nation and its residential customers constitute the largest group of users for LADWP. Each residential user uses about 5,900 kilowatt-hours of electricity per year on average. However, the largest users of electricity in the City are the businesses and the industries, who consumes approximately 70 percent of the total electricity provided by LADWP. In addition, LADWP provides electricity for public services such as streetlights, the water system, and sells electricity to other utility providers.[54]

LADWP is capable of providing 7,850 MW from a diverse mix of energy sources while the peak demand on record was reached on August 31, 2017, at 6,502 MW.[55] LADWP is composed of 23 generation plants, with over 3,600 miles of transmission circuits.[56]

Electricity would be required during construction for the implementation of construction trailers, lighting, and electronic equipment. However, the electricity required for construction is expected to be minor as the primary energy used by most construction equipment would be petroleum based (i.e. gasoline and diesel).

During operation, the new buildings' combined energy consumption is projected to require 973,368 KWH, with each new building's individually projected operating energy consumption provided below:

- Building A: 524,382 KWH
- Building B: 296,216 KWH
- Building C: 152,770 KWH[57]

54 LADWP, "Past and Present," https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=179urhlety_4&_afrLoop=198429219464879, Accessed 2/11/2020.

55 LADQP, *Briefing Book 2018-2019*.

56 LADWP, "Facts and Figures," https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_afrWindowId=null&_afrLoop=219924907324226&_afrWindowMode=0# percent40 percent3F_afrWindowId percent3Dnull percent26_afrLoop percent3D219924907324226 percent26_afrWindowMode percent3D0 percent26_adf.ctrl-state percent3Dd29zibzgn_51, Accessed 2/11/2020.

57 LPA, *4 Sustainability, 4.3 Renewable Energy Study*.

Operation electricity consumption of the proposed Project is expected to be similar or reduced from that of the existing energy consumption level since the Project would be reducing service capacity. The upgraded facilities and energy efficient features would also help reduce the amount of energy required for operation. Furthermore, the compliance with energy efficiency programs Title 24 standards, CALGreen, L.A.'s Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Board of Education Resolution 018-19/20, and existing energy standards and regulations would require the implementation of energy efficient facilities and renewable energy capabilities on campus. Therefore, the wasteful or unnecessary electricity consumption during construction and operation would be less than significant.

Natural Gas

Southern California Gas Company (SoCalGas) is the natural gas provider for the Project site and the surrounding area. SoCalGas expects the abnormal peak demand in 2020-2021 to peak at 2,898 million cubic feet per day, with a maximum available supply of 4,317 million cubic feet per day. In addition, the demand for natural gas is expected to decrease over the years due to increase in efficiency starting in 2018 and projected through the year of 2035.[58]

Natural gas would primarily be used to support electricity output during the operation of the proposed Project. The proposed Project would replace and upgrade facilities on campus and reduce the classroom capacity at Hamilton HS. Due to the age of the existing campus the facility upgrades are expected to increase the school's operational efficiency and reduce the existing usage of natural gas. In addition, the reduction of the campus capacity would also further reduce the amount of natural gas needed on-campus during operation. Compliance with energy efficient programs including LAUSD CHPS and the CALGreen Code would also lower natural gas consumption from existing levels. Therefore, less than significant impact for unnecessary or wasteful natural gas consumption is expected.

Petroleum

Petroleum products that would be primarily used by the proposed Project would compose of gasoline and diesel. Based on the data provided by the US Energy Information Administration, in 2013 the Southern California and Southern Nevada Region (SCSN Region) was able to produce roughly 526.8 thousand barrels/day, or an estimated 91 percent of the 606.6 thousand barrels/day demand in the region. Additional fuel supply enters the region primarily from refineries in Northern California and Washington State. There is also imports from the global market if demand is not met by the local suppliers. Distillate (including diesel) supply in the SCSN Region is produced entirely within the region itself. In 2013, the SCSN Region produced approximately 182.5 thousand barrels/day of diesel which represents roughly 117 percent of the regionwide consumption of 155.5 thousand barrels/day.[59]

Construction for the proposed Project would include demolition, grading, building construction, landscaping, utility installation, and interior remodeling involving the entire campus in different phases. Petroleum would be

58 *California Gas Report. 2018 California Gas Report.* 2018. https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed March 16, 2020.
59 EIA, "West Coast Transportation Fuels Markets." September 2015. https://www.eia.gov/analysis/transportationfuels/padd5/pdf/transportation_fuels.pdf. Accessed March 17, 2020.

the primary fuel source used during construction to power heavy-duty equipment, operate haul trucks and delivery trucks, and operate temporary power for lighting and electronic equipment. The use of petroleum fuel during construction would comply with **SC-AQ-2** and **MM-AQ-1**, which would reduce the amount of petroleum products used through more up to date and efficient equipment that are properly maintained. With the incorporation of **SC-AQ-2**, **MM-AQ-1** and compliance with local, State, and Federal requirements, the impacts of unnecessary or wasteful petroleum use is expected to be less than significant.

Overall, the proposed Project would comply with the Title 24 standards, CALGreen, L.A.'s Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2**; **SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, there would be less than significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.[60] No mitigation or further study is required.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact.

Renewable Energy

In 2007, the Integrated Resource Plan (IRP) was published and provided a roadmap for reaching at least 20 percent renewable energy by the end of 2010. The IRP also laid out a strategy for reducing GHG emissions to meet the California Global Warming Solutions Act of 2006. The IRP was updated in 2010 to continue increasing renewable energy and reducing GHG emissions from the LADWP power plant. By 2010 LADWP has met its goal of 20 percent renewables as a number of wind projects came online and has already reduced the carbon emissions from the power plants to 22 percent below 1990 levels.[61] LADWP is looking to increase its renewable energy portfolio to 33 percent by the end of 2020, and 100 percent by the end of 2045. As an entity that is serviced by LADWP, the utility usage at Hamilton HS is directly impacted by the improvements and upgrades at its facilities. The renewable energy improvements at LADWP directly shifts the electricity portfolio used by the Campus.

In addition to the improvements at LADWP, the LAUSD Board of Education (Board) also passed a resolution on December 3rd, 2019 to transition all of its operations to 100 percent clean, renewable energy.[62] Hamilton HS will achieve 100 percent renewable energy through its electricity provider at LADWP by 2045.

A Renewable Energy Study was also done for Hamilton HS in January 2020 by LPA. It assessed the amount of solar energy that would be necessary in order to achieve 50 percent renewable energy for the new buildings on campus using just solar. The study will provide a basis for future renewable energy improvements at the campus

60 Due to the number of players and processes that is involved in the construction material production process, the energy use of the material production process cannot be reasonably estimated in this study document.

61 LADWP, "Past," https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-past?_adf.ctrl-state=179urhlety_4&_afrLoop=198513922945379, Accessed 2/11/2020.

62 LAUSD, Board of Education, http://laschoolboard.org/sites/default/files/12-03-19RegBdOBMaterialsSTAMPEDWithLinksPublic.pdf, Accessed 2/11/2020.

as LAUSD mandates that all new buildings are required to have the capability of adding renewable energy that is capable of providing at least 50 percent of the electricity consumed by the new buildings on existing campuses.

Energy Efficiency

LADWP began upgrading its Generating Stations to cleaner and more efficient versions starting in 1989 and under the 2000 IRP. Since the upgrades nitrogen oxide emissions have been reduced by approximately 90 percent, efficiency has been increased by 30 percent to 40 percent, and carbon dioxide emissions from these plants have been reduced by 30 percent to 40 percent.[63]

Additionally, LAUSD has developed a CHPS program that will incorporate energy saving features to minimize energy consumption. The proposed Project is also required to comply with Title 24 of the State policy on new building energy efficiency. Both Title 24 and the CHPS program aims to improve energy efficiency in buildings, minimize impacts during peak energy-usage periods, and reduce impacts on State energy needs.

The proposed Project would comply with the Title 24 standards, CALGreen, City' Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2**; **SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, impacts during construction and operation of the proposed Project would be less than significant. No mitigation or further study is required.

63 LAUSD, Board of Education, http://laschoolboard.org/sites/default/files/12-03-19RegBdOBMaterialsSTAMPEDWithLinksPublic.pdf, Accessed 2/11/2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Explanation:

A Report of Geotechnical Investigation has been completed for the proposed Project and is included in **Appendix E: Report of Geotechnical Investigation**.

LAUSD has SCs for minimizing impacts to geology and soils. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.

LAUSD Standard Conditions of Approval	
	Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities. Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-CUL-11	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

No Impact. Alquist-Priolo Earthquake Fault Zones are regulatory zones that encompass surface traces of active faults that have a potential for future surface fault rupture. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to identify hazards associated with surface fault ruptures and to prevent the construction of buildings on active faults.[64] Proposed development needs to be proven through geologic investigation to not be located across active faults before a city or county can permit the implementation of projects. Alquist-Priolo Special Studies Zones are now commonly known as State of California Earthquake Fault Zones.

The Project is not mapped within an Alquist-Priolo Earthquake Fault Zone.[65] The nearest active fault zone to the Project is known as the Newport – Inglewood Fault Zone approximately 0.4 miles northwest

64 LAUSD, Board of Education, "http://laschoolboard.org/sites/default/files/12-03-19RegBdO BMaterialsSTAMPEDWithLinksPublic.pdf"http://laschoolboard.org/sites/default/files/1219RegBdOBMaterialsSTAMPEDWithLinksPublic.pdf, Accessed 2/11/2020.

65 Amec Foster Wheeler, Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School. June 5, 2017.

of the site.[66] However, the closest Alquist-Priolo Earthquake Fault Zone, established for a section of the Newport-Inglewood fault zone, is located approximately 0.7 miles southeast of the site.[67] Other faults located around the Project area are the Santa Monica Fault (approximately 2.4 miles northwest of the site), the Hollywood Fault (approximately 3.4 miles north-northwest of the site), and the Anacapa-Dume Fault (approximately 5 miles west of the site).[68] The Project is the renovation of an existing school site and does not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people, or structures, to the risk of loss, injury, or death due to rupture of a known earthquake fault. Additionally, the proposed Project would include seismic retrofit upgrades that would enhance the safety of the student, staff, and visitors on campus. As the proposed Project would reduce the seismic risks of the existing site; therefore, no impacts would occur.

ii. Strong seismic ground shaking?

Less than Significant Impact. Southern California is a highly active seismological area. The Project would not increase exposure of people or structures to earthquake impacts, as renovation and new building construction would occur within an existing utilized campus. Since the Project is mapped within the Newport-Inglewood Fault Zone, it is probable that the Project site would experience moderate to strong ground motion due to earthquakes.

Of the 23 buildings on campus, 11 will be demolished under the proposed Project and two will be seismically retrofitted and modernized. The Project also plans on constructing five new buildings on Campus. The new buildings that would replace the demolished buildings would be constructed in accordance with the California Building Code (CBC) and DSA standards. As a public school, Hamilton HS would comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. As the new and retrofitted buildings would comply with all of the aforementioned regulations, the proposed Project would improve upon Hamilton HS's ability to withstand strong seismic ground shaking. Therefore, impacts of the proposed Project related to strong seismic ground shaking significantly impacting the site is considered less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction occurs when loose, cohesionless, and water-saturated soils (generally fine-grained sand and silt) are subjected to strong seismic ground motion of a single sudden motion or through repeated cyclic durations. Such soils essentially behave like liquids, losing shear strength. Improvements constructed on these soils may buckle, tilt, or settle when the soils liquefy. Liquefaction more often occurs in earthquake-prone areas underlain by young, sandy alluvium where the groundwater table is less than 50 feet below the ground surface.

66 Amec Foster Wheeler, Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School. June 5, 2017.
67 Amec Foster Wheeler, *Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School.* June 5, 2017.
68 Amec Foster Wheeler, *Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School.* June 5, 2017.

The Project site is not located in an area where soils are susceptible to liquefaction and seismically induced settlement.[69] Impacts from ground failure and/or liquefaction would be less than significant.

iv. Landslides?

No Impact. Landslide is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

The general topography of the Project site is relatively flat.[70] The Project is not located within an area identified to have a potential for seismic slope instability or near, or within the path of, any known landslides.[71] In the absence of significant slopes, the potential for seismically induced landslides to affect the Project site are considered negligible. As the Project would not exacerbate any existing conditions, no impact would occur.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

Construction Phase

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the Project site; therefore, redevelopment of the site would not result in the loss of topsoil.

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. The site is greater than one-acre in area; thus, Project construction would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. This is also required under the LAUSD **SC-HWQ-2**. Construction-phase soil erosion impacts would be less than significant.

69 *Zone Information and Map Access System (ZIMAS)*. http://zimas.lacity.org/. Accessed March 6, 2020.
70 Amec Foster Wheeler, *Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School*. June 5, 2017.
71 Amec Foster Wheeler, *Report of Geotechnical Investigation Proposed School Modernization- Alexander Hamilton High School*. June 5, 2017.

Operational Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate **SC-HWQ-1**, which would be consistent with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County Department of Public Works in February 2014.[72]

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. Hazards arising from liquefaction and seismically induced settlement and landslides would be less than significant, as discussed above in sections a.(iii) and (iv). The Project would be designed and constructed in accordance with current engineering practices, the impacts would be less than significant.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases. This activity can shift, crack, or break structures build on such soils. As stated above in section a.(ii), (iii), and (iv) all potential impact from soil quality would be reduced through compliance with proper design and construction practices. Therefore, impacts would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project would not include the installation or use of septic tanks or alternative wastewater disposal systems. The proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact related to alternative wastewater disposal systems would occur.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of nonfossil material dating to any period preceding human occupation.

As discussed above, the Project site have been previously disturbed and, therefore, it is unlikely that undisturbed paleontological resources exist on the Project site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. Earth moving and grading activities could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. As part of the Project implementation, **SC-CUL-11** requires that a paleontological monitoring program be prepared and implemented for earthwork activities. In the unlikely event that paleontological resources are uncovered, construction within a 30-foot radius would stop and LAUSD would be notified. As a result, impacts to paleontological resources would be less than significant.

72 Adopted by the City, Board of Public Works on May 9, 2016. https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to greenhouse gas emissions. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-USS-1	**School Design Guide** Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum nonhazardous construction and demolition debris recycling requirement of 75 percent by weight as defined in Specification 01340, Construction & Demolition Waste Management. Guide Specifications 2004 - Section01340, Construction & Demolition Waste Management. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of nonhazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75 percent of the C&D waste generated.
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning and evening hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the time dependent valued energy of the proposed Project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. In September 2016, AB 197 and SB 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15.

The CalEEMod model used to calculate the criteria pollutant emissions was also utilized to calculate the GHG emissions associated with construction and operation of the proposed Project. For the results of the CalEEMod model, please refer to **Appendix A** of the *Air Quality Study for the Hamilton High School Comprehensive Modernization Project*. As shown in **Table 7** and **Table 8** in **Section III: Air Quality**, the construction and operational emissions unmitigated would be considerably lower than the SCAQMD threshold for the duration of the project. Therefore, net localized construction and operational emissions would not exceed localized thresholds.

The proposed Project would not generate direct GHG emissions from new vehicle trips or on-site sources due to capacity increase or change in operation. Additionally, no indirect emissions from off-site energy production required for on-site activities, water use, and waste disposal would be generated. Implementation of the proposed Project would not increase the school capacity or result in any new sources of GHG emissions once construction of the Project is complete. Therefore, there is no operational impact of the proposed Project related to GHG emissions. In addition, it is not anticipated that construction would generate GHG emissions that would exceed the SCAQMD significance thresholds.

In addition, the proposed Project would be subject to the GHG SCs. **SC-GHG-1** through **SC-GHG-5** would require water and energy efficient features and measures to be included prior to operation of the proposed Project. As such, the impact relating to the generation of GHGs would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. In response to concern regarding GHGs and global climate change, the State passed AB 32, also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq.) mandated a reduction in the State's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its

jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

Senate Bill 32 (SB 32) was signed into law on August 31, 2016. This bill requires CARB to adopt rules and regulations to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

The Project site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed Project would be well below the SCAQMD thresholds, the proposed Project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed Project would not conflict with the State's ability to meet its GHG goals under AB 32 and SB 32.

In addition, SB 375 passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategy that reduce vehicle miles traveled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multimodal transportation options and identifying land use strategies that focus new housing and job growth in areas served by public transit. Moreover, LAUSD has committed to 100 percent renewable energy, which would also reduce GHG emissions.[73] Development of the proposed Project would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

73 LAUSD, "Los Angeles Unified School Board Commits to Transitioning to 100 percent Clean, Renewable Energy." https://achieve.lausd.net/site/default, Accessed March 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Explanation:

A Phase I Environmental Site Assessment has been completed for the proposed Project and is included in **Appendix F: Phase I Environmental Site Assessment**.

LAUSD has SCs for minimizing impacts to hazards and hazardous materials. Applicable SCs related to hazards and hazardous materials impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).

LAUSD Standard Conditions of Approval	
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less Than Significant Impact. The Project will include the removal of arsenic and lead impacted soil on the Campus that was identified during the preparation of a Preliminary Environmental Assessment-Equivalent report for the Project. The lead and arsenic impacted soil that was identified is currently underneath pavement and, therefore, does not present an exposure risk to students and staff currently on the Campus. In addition, the lead and arsenic impacted soil was characterized as non-hazardous waste. The lead and arsenic impacted soil, along with any other soil impacted with chemicals of concern being removed, will be removed in accordance with the Removal Action Workplan (RAW) that will be prepared for the Project. The RAW would be consistent with the criteria specified in the California Health and Safety Code (H&SC) §25356.1(h) and would include a description of the on-site impact, a plan for conducting the removal action, and the goals to be achieved by the removal action, as required by Health & Safety Code (H&SC) §25323.1. Compliance with the RAW, will ensure that the removal of impacted soil does not create a significant hazard to the public or the environment. In addition, the buildings designated for demolition for the proposed Project were constructed prior to 1976, before the Toxic Substances Control Act came into effect, addressing the production, importation, use, and disposal of chemicals including asbestos, radon, PCBs and lead. Hazardous materials are also regulated by the United States Environmental Protection Agency (US EPA), Department of Toxic Substances Control (DTSC), Occupational Safety & Health Administration (OSHA), SCAQMD, and the Los Angeles Fire Department (LAFD). Given the age of the buildings, the materials and features of the structures to be demolished may contain substances that would be considered hazardous. Demolition, modernization, and associated construction activities would alter the structure and materials potentially release any hazardous waste components if not properly contained. However, proper testing will be done prior to any demolition or alterations required for the proposed Project. If any hazardous waste materials are found, proper containment and removal procedures would be followed and carried out by licensed professionals. In addition, any transport, use, or disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities.

The proposed Project is an educational facility which would not involve routine transport, use, or disposal of hazardous materials during operation. Required maintenance supplies such as pesticides, cleansers, lubricants, and paints would be used and stored on site. Proper maintenance of storage areas and appropriate storage of hazardous materials on campuses would be required. All hazardous materials would be contained, stored, and used according to manufacturers' instructions and handled in compliance with applicable standards and regulations.

The proposed Project would comply with the Toxic Substances Control Act and existing federal, State, and local standards and regulations regarding hazardous waste. Compliance with existing standards and regulations

would minimize associated risks to a less than significant level and would not pose a significant impact to the public or the environment. No mitigation or further study is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The proposed Project construction may require the transportation, use, and disposal of hazardous waste materials. As referred to within Threshold (a), the buildings designated for demolition are built before the enactment of the Toxic Substances Control Act came into effect in 1976 and may contain materials and chemicals that would be considered hazardous. According to the EnviroStor database on DTSC's website, the nearest cleanup site is 0.4 miles away from the proposed Project site at the intersections of the Venice Boulevard and the Exposition Boulevard. In addition, the handling of the hazardous waste materials is regulated by the US EPA, DTSC, OSHA, SCAQMD, LAFD. The proposed Project will comply with all applicable local, State, and federal regulations governing such activities.

During the operation of the proposed Project, hazardous waste use would be minimal and in small quantities. The hazardous waste material will be properly used and stored according to the manufacturers' instructions and follow any additional health and safety requirements stipulated by LAUSD OEHS, including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.[74]

According to the DTSC EnviroStor database a Preliminary Endangerment Assessment (PEA) Determination was completed for Hamilton HS in 2001. The report indicated that no actual or potential hazardous materials release was indicated which would pose a threat to human health or the environment under any land use. In addition, the nearest cleanup site is 0.4 miles south of the proposed Project site at the intersections of the Venice Boulevard and the Exposition Boulevard. The cleanup was voluntary and the site contained lead and arsenic which was removed in 2015.

The proposed Project would comply with the Toxic Substances Control Act and existing federal, State, and local standards and regulations regarding hazardous waste. Hazardous release impacts during construction and operation of the proposed Project would be less than significant. No mitigation or further study is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The proposed Project is located in a mixed-use neighborhood with both commercial and residential development. Schools within one-quarter mile include the Cheviot Hill Continuation School that is adjacent to the northern edge of the campus on Cattaraugus Avenue, Westside Community Adult School adjacent to the eastern edge of the campus on Robertson Blvd, and Recording Connection Institute to the north on Robertson Blvd. The proposed Project site is a school as well and impacts will incur if hazardous waste materials were to be released on campus.

74 LAUSD, "Office of Environmental Health & Safety," https://achieve.lausd.net/Page/2562. Accessed 2/13/2020.

As presented in Thresholds (a) and (b), the proposed Project will include demolition and alteration of existing buildings constructed prior to 1976, the enactment of the Toxic Substances Control Act. Due to the ages of the existing buildings, material and parts of the buildings designated for demolition may contain hazardous waste materials. The proposed Project will require routine transport, use, and disposal of materials with the potential to contain hazardous chemicals. However, the handling of hazardous waste is regulated by the US EPA, DTSC, OSHA, SCAQMD, and LAFD. In addition, the proposed Project would implement SCs **SC-HAZ-4** and **SC-T-4** to reduce the amount of hazardous waste materials emitted during construction.

During operation, the proposed Project is expected to continue its current functions with minimal uses of hazardous materials on site. Any hazardous chemicals used would be properly handled and stored according to manufacturer's instructions. Operation of the proposed Project would also follow applicable LAUSD regulations including LAUSD OEHS Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs. Procedures and systematic evacuation instructions are also available in the event that an unintended hazardous waste emission takes place. In addition, the proposed Project would comply with all applicable local, State, and federal regulations governing such activities, decreasing the impact of handling the hazardous waste materials to less than significant. No mitigation or further study is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. DTSC's EnviroStor database, EPA's National Priorities List and Superfund Alternative Approach Sites, and SWRCB's GeoTracker indicate the proposed Project site is not located on, or in the general vicinity of, any hazardous materials sites compiled pursuant to Government Code Section 65962.5. As mentioned in Threshold (b), the DTSC EnviroStor database indicated that a Preliminary Endangerment Assessment (PEA) Determination was completed for Hamilton HS in 2001. The report indicated that no actual or potential hazardous materials release was indicated which would pose a threat to human health or the environment under any land use. In addition, the nearest cleanup site is 0.4 miles south of the proposed Project site at the intersections of the Venice Boulevard and the Exposition Boulevard. The cleanup was voluntary and the site contained lead and arsenic which was removed in 2015. Therefore, the proposed Project will not create a significant hazard to the public or the environment. No mitigation or further study is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The proposed Project is not located within an airport land use plan or within two miles of a public airport. The closest airport to the proposed Project is the Santa Monica Airport approximately 3.1 miles west of the proposed Project site. Given the nature and location of the proposed Project, no safety hazards or excessive noise impacts would occur due to the proximity of an airport. No mitigation or further study is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Since public schools are designed as critical community facilities, the campuses are often used as evacuation centers during disasters. Construction for the proposed Project will be conducted in phases to allow partial use of campus facilities as emergency resources. In addition, LAUSD schools are required to comply with the California Education Code Sections 32281-32289 dealing with the preparation of "Safe School Plans." The Safe School Plans develop emergency response protocols during an emergency on a District site during renovation, modification, and contracted work. The Safe School Plans are updated annually to capture the most up to date policy advances and protocol improvements. In addition, contractors on site would also develop an emergency response plan in the event of an unforeseen emergency. During an emergency during construction, all applicable protocols would be followed.

The function and operation of the proposed Project site will remain unchanged. LAUSD has developed an Emergency Operation Plan (EOP) that provides protocols and assigned personnel in response to recovery efforts in the event of an emergency. The EOP functions in coordination with the local ordinances and would not interfere with locally adopted emergency response plan and emergency evacuation plans. Locally adopted plans applicable to the proposed Project include City' Emergency Operation Master Plan, Local Hazard Mitigation Plan, and the Los Angeles County Operational Emergency Response Plan. Therefore, the operation of the proposed Project is not expected to interfere with an adopted emergency response plan and emergency evacuation plan. No mitigation or further study is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The proposed Project is not within the areas identified as Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). Under Government Code 51175-89, CAL FIRE is directed to identify areas of VHFHSZ based on fuels, terrain, weather, and other relevant factors. The information is used to determine mitigation measures to reduce the risk associated with wildfires.[75] Given the nature and location of the proposed Project, no exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No mitigation or further study is required.

75 State of California and the Department of Forestry and Fire Protection. Very High Fire Hazard Severity Zones in Local Responsibility Areas. https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed 2/12/2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or off-site erosion or siltation;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to hydrology and water quality. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **Stormwater Technical Manual** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities. **Compliance Checklist for Storm Water Requirements at Construction Sites** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

LAUSD Standard Conditions of Approval	
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable: • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The proposed Project site is located in a highly developed neighborhood in the City, surrounded by developments ranging from commercial and multifamily housing to single-family housing. New construction projects can produce short-term impacts through construction activity and long-term impacts through an increase of impervious surfaces. Majority of the existing Project site is composed of impervious surfaces and producing nonpoint source discharges. Existing systems are designed to handle the existing discharges from the site. Impervious surfaces can increase the concentration of pollutants, such as oils, trash, pesticide, and sedimentation from storm runoff.

Section 13050 of the California Water Code (CWC) defines significant impact on surface water quality if the discharge will include pollution, contamination, or nuisance. A significant impact may occur if the proposed Project would produce discharge to surface water which does not meet the quality standards of the regulating agencies. Construction of the proposed Project will include the transportation of soil, grading, and excavating. Prior to the start of the demolition or soil-disturbance, the District is required to file Permit Registration Documents (PRDs) to the SWRCB electronically per LAUSD Reference Guide REF-6286.0. LAUSD REF-6286.0 requires projects which involve demolition, clearing, grading and excavation on land areas equal to or greater than one acre to comply with SWRCB Order No. 2009-0009-DWQ. REF-6286.0 outlines the process and requirements for compliance with Order No. 2009-0009-DWQ.

The proposed Project is designed to maintain the existing and historic patterns and storm water discharge locations along the perimeter of the Project site.[76] The design of the site will intercept and capture stormwater runoff within the Project site to the extent feasible. Irrigation systems and other water delivering features would be selected in accordance with the LAUSD standards to maintain water efficiency on campus and reduce discharge. The expected volume of discharge during operation is expected to be comparable to the existing discharge volume at the site.

76 LPA, *Hamilton High School Comprehensive Modernization Project*, "Basis of Design Narrative- Final Schematic Design Documents." January 10, 2020.

The proposed Project would implement a SWPPP, BMPs, and monitoring for storm water discharges to ensure that sedimentation of downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from the federal, State, and local levels, including Section 402 of the Clean Water Act, the US EPA's NPDES program, and **SC-HWQ-1** through **SC-HWQ-3**. The implemented measures will minimize the water discharged to a less than significant level. No mitigation or further study is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project site is located within the Santa Monica Sub-basin of the Coastal Plains of Los Angeles Groundwater Basin. The historical high groundwater level was determined to be approximately 40 feet by the California Geological Survey (CGS). Ground water at the site is currently measuring at depths between 35 feet and 43 ½ feet. In 2001, the groundwater was measured at depths in between 42 ½ feet and 45 feet.[77] The closest groundwater well is located at intersections of La Cienega Boulevard and Washington Boulevard, approximately one mile east from the proposed Project site.

A significant impact would occur if the proposed Project would significantly deplete or substantially interfere with existing groundwater recharge. As referred to within Threshold (a), the existing Project site is highly developed with little existing permeable surface area. The proposed Project would not add significant impermeable surface to the existing Project site and would, therefore, not significantly interfere with existing groundwater recharge. The proposed Project would also not increase capacity at the school site or significantly increase its water usage. Additionally, the proposed Project site is not designated as part of the Sole Source Aquifer Program or designated as an area for groundwater recharge activities.[78] Because of the factors mentioned, the proposed Project's groundwater impact would be less than significant. No mitigation or further study is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or off-site erosion or siltation;

Less than Significant Impact. Construction of the proposed Project would involve grading and excavating of the Project site. The loose soil from construction, when exposed to rainfall or runoff would create on- or off-site erosion or siltation. However, as mentioned in threshold (a), the proposed Project would implement a SWPPP, BMPs, and monitoring for storm water discharges to ensure that sedimentation of downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from the federal, State, and local levels, including Section 402 of the Clean Water Act, the US EPA's NPDES program, and **SC-HWQ-1** through **SC-HWQ-3**. The programs to be implemented and compliance

77 Amec Foster Wheeler for LAUSD, *Report of Geotechnical Investigation Proposed School Modernization*. June 5, 2017.
78 EPA, *Ground Water, Sole Source Aquifer*. https://archive.epa.gov/region9/water/archive/web/html/ssa.html. Accessed February 21, 2020.

with the existing regulations would reduce the impacts of on- and off-site erosion or siltation to less than significant impact. No mitigation or further study is required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

No Impact. Construction of the proposed Project would produce surface runoff for dust control and other activities related to construction. However, the amount of runoff would be minimal. During operation, as mentioned within threshold (a), the proposed Project is designed to maintain the existing and historic patterns and storm water discharge locations along the perimeter of the Project site. Runoff from the site is designed to be intercepted and captured within the Project site to the extent feasible. Irrigation systems and other water delivering features would be selected in accordance with the LAUSD standards to maintain water efficiency on campus and reduce discharge. The expected volume of discharge generated by the operation of the Project site is expected to be comparable to the existing discharge volume at the site. The Project is not expected to substantially increase the rate or amount of surface runoff that would result in flooding on or off site. No mitigation or further study is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. The proposed Project would produce runoff during construction through dust control measures and other construction related activities. However, the amount of runoff created would be minimal. During Project operation, as mentioned within threshold (a), the runoff is designed to be intercepted and captured within the Project site to the extent feasible and minimize polluted runoff from the Project site. New storm water discharge flow rates that exceed existing discharge flow rates at points of connection to public storm drain systems will be detained on site in underground storage pipes, chambers, or pre-cast concrete vaults.79 In addition, the operation of the proposed Project is expected to produce similar runoff volume as the existing operation of the Project site. Therefore, the impact of the proposed Project would be less than significant. No mitigation or further study is required.

iv) Impede or redirect flood flows?

No Impact. The proposed Project site is not located within the Special Flood Hazard Areas or Other Areas of Flood Hazard according to the National Flood Hazard Layer FIRMette provided by FEMA.80 The proposed development is also not located with the Tsunami Inundation Zone.81 The proposed Project site is also not located adjacent to a river body as the closest water body is the channelized Ballona Creek, approximately 1

79 LPA, *Hamilton High School Comprehensive Modernization Project*, "Basis of Design Narrative- Final Schematic Design Documents." January 10, 2020.
80 FEMA, *National Flood Hazard Layer FIRMette*. https://p4.msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/nfhlprinttool2_gpserver/j997c7c3291354efc87316ed4aa991664/scratch/FIRMETTE_782509a1-54d2-11ea-b923-0050569ce01d.pdf. Accessed February 21, 2020.
81 California Department of Conservation, "Los Angeles County Tsunami Inundation Maps." https://www.conservation.ca.gov/cgs/tsunami/maps/Los-Angeles. Accessed February 21, 2020.

mile south of the proposed Project site. The proposed Project will have no impact to impede or redirect flood flows. No mitigation or further study is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. As referred to within threshold (c)(iv), the proposed Project site is not located within the Special Flood Hazard Areas or Other Areas of Flood Hazard according to the National Flood Hazard Layer FIRMette provided by FEMA. The proposed Project site is also not located within the Tsunami Inundation Zone according to the California Department of Conservation. Therefore, the proposed Project is at no risk of risk release of pollutants due to project inundations. No mitigation or further study is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As mentioned in threshold (a), the proposed Project would implement a SWPPP, BMPs, and monitoring for storm water discharges to ensure that sedimentation of downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from the federal, State, and local levels, including Section 402 of the Clean Water Act, the US EPA's NPDES program, and **SC-HWQ-1** through **SC-HWQ-3**. In addition, as referred to in threshold b), the proposed Project is not designated as an area for groundwater recharge and would not significantly increase water usage where it would significantly impact existing groundwater usage. Therefore, the proposed Project would not impact the implementation of a water quality control plan or sustainable groundwater management plan. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Explanation:

There are no Land Use And Planning LAUSD SCs that apply to this Project.

a) Physically divide an established community?

No Impact. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community or outlying area. The proposed Project would be constructed on an existing school campus and would not change the use of the Project site. The Project would not introduce any components that would physically divide the Castle Heights neighborhood it is located in. No impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The Project site is designated by the City General Plan and the Palms-Mar Vista-Del Rey Community Plan as "Public Facilities" or PF-1. Under the proposed Project, the use of the land is under public elementary or secondary schools, which is the result of the PF zoning designation. New construction of the Campus would not change the land use of the Project site and would not conflict with existing plans, policies, or regulation adopted for the purpose of avoiding or mitigating environmental effects. Under the California legislature and provided that the school district complies with the terms of Government Code Section 53904, the school district is granted the power to exempt school property from local zoning requirements. This not only applies to Hamilton HS, but all LAUSD school sites. Moreover, the school would continue to operate as it does currently without capacity increases or expansion. The proposed Project would also not produce any changes to nearby land use. For a visual representation of the Project's surrounding land uses please refer to **Figure 2**. No impacts would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Explanation:

There are no Mineral Resources LAUSD SCs that apply to this Project.

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?

No Impact. Natural mineral deposits are nonrenewable resources that cannot be replaced once they have been depleted.[82] Lands are classified into four main Mineral Resource Zones (MRZ): **MRZ-1**, areas where geologic information indicates no significant mineral deposits are present; MRZ-2, areas that contain identified mineral resources; **MRZ-3**, areas of undetermined mineral resource significance; and MRZ-4, areas of unknown mineral resource potential.

In the City, the primary mineral resources are sand, rock and gravel deposits. The Project is located within the primarily residential Castle Heights neighborhood in the City of Los Angeles. There are no identified mineral resources within the Project site as designated by the City General Plan.[83] The Project would not cause a loss of availability of known mineral resource valuable to the region and the State, and no impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project area is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field.[84] Therefore, development of the proposed Project would not cause a loss of availability of a mining site, and no impact would occur.

82 *City General Plan*, "Conservation Element," Section 18: Resource Management: Mineral Resources (Sand and Gravel) https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf
83 *City General Plan*, "Conservation Element," Exhibit A Mineral Resources. 2001 Report. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf
84 *Zone Information and Map Access System (ZIMAS)*. http://zimas.lacity.org/. Accessed March 6, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Explanation:

A Noise Study has been completed for the proposed Project and is included in **Appendix G: Noise Study**.

LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA Leq.4
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA Leq with a target of 40 dBA Leq (unoccupied), and a reverberation time of 0.6 seconds.
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses, and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other sensitive land use disruptions.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building.

LAUSD Standard Conditions of Approval	
	• During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSDS sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: **Source Controls** • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noise work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classroom has ended; residential only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well-maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually adjustable or ambient sensitive types. **Path Controls** • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noise activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. **Receptor Controls** • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialogue to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. This notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary. Noise control measures may include, but are not limited to: **Path Controls** • Noise Attenuation Barriers – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. • Scheduling – performing noise work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM).

LAUSD Standard Conditions of Approval	
	Source Controls • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually adjustable or ambient sensitive types.

The primary sources of noise within the study area consists of vehicle traffic on Robertson Boulevard, other local roads, and Interstate 10 located as near as 0.2 miles to the east of the Project site; aircraft overflights; and from on-site activities that include student interactions outside. In order to quantify the existing noise environment as well as to quantify noise sources that may be altered as part of the proposed Project, five noise measurements were taken in the vicinity of the Project site. All noise measurements were taken for a period of 10 minutes and the results of the noise level measurements are presented in **Table 8: Ambient Noise Measurements**. The noise measurement printouts are provided in **Appendix G**, which also has a figure that depicts the locations of the noise measurements and a photo index showing the locations of the noise measurements.

Table 8

Ambient Noise Measurements

Location Number/Description		Nearest Use	Time Period	Noise Source	dBA Leq
1	North of the Project site along Cattaraugus Avenue	Residential/ School	9:00 AM–9:15 AM	Pedestrian and light/medium traffic along Cattaraugus Avenue, light school activity	59.5
2	Southwest of the Project site at the Canfield Avenue and Kincardine Avenue intersection	Residential/ School	9:27 AM–9:37 AM	Pedestrian and light traffic along Canfield Avenue and Kincardine Avenue, light school activity	55.0
3	South of the Project site at the Livonia Avenue and Kincardine Avenue intersection	Residential/ School	9:52 AM–10:02 AM	Light traffic along Livonia Avenue and Kincardine Avenue	58.9
4	Southeast of the Project site at the Robertson Boulevard and Kincardine Avenue intersection	Commercial/School	10:17 AM–10:37 AM	Heavy traffic along Robertson Boulevard	72.2
5	Northeast of the Project site at the Robertson Boulevard and Cattaraugus Avenue intersection	Commercial/School	10:45 AM–10:55 AM	Heavy traffic along Robertson Boulevard	69.6

Source: Refer to **Appendix G: Attachment A** for noise monitoring data sheets.
Notes: dBA = A-weighted decibels; Leq = average equivalent sound level.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards?

Less than Significant Impact. Two criteria were used for judging noise impacts. First, noise levels generated by the proposed Project must comply with all relevant federal, State, and local standards and regulations. Noise impacts on the surrounding community are limited by local noise ordinances, which are implemented through investigations in response to nuisance complaints. It is assumed that all existing regulations for the construction and operation of the proposed Project will be enforced.

The second measure of impact used in this analysis is a significant increase in noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has the potential to adversely impact people. According to LAUSD guidelines, a proposed Project would have a significant noise impact if it would do any of the following:

- Create a maximum exterior noise level exceeding 70 dBA L10 or 67 dBA Leq
- Result in a maximum interior classroom noise level exceeding 55 dBA L10 or 45 dBA Leq
- Result in a permanent increase in noise levels at nearby sensitive land uses exceeding 3 dBA CNEL.
- The following additional criteria are from the City. A proposed Project would have a significant noise impact if it would do any of the following:
    - Generate operational noise from traffic and on-site sources that would cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL and noise levels reach or are within the "normally unacceptable" or "clearly unacceptable" category or increase by 5 dBA CNEL or greater.
    - Generate noise from operational stationary sources that causes ambient levels to increase by more than 5 dB.
    - For construction activities lasting more than one day, exceed existing exterior ambient levels by 10 dBA or more at a noise sensitive use.
    - For construction activities lasting more than ten days in a three-month period, exceed existing exterior ambient levels by 5 dBA or more at a noise sensitive use.
    - For construction activities between 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday, exceed the ambient level by 5 dBA at a sensitive receiver.

The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed Project and compares the noise levels to the LAUSD and City standards.

Construction Impacts

On-Site Construction Noise

Construction activities that would occur during the construction phases (demolition, grading, building construction, building interiors, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics.

Typical maximum noise levels and duty cycles of representative types of equipment that would potentially be used during construction for this Project are presented in **Table 9: Typical Maximum Noise Levels for Project Construction Equipment**. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project site.

Table 9

Typical Maximum Noise Levels for Project Construction Equipment

Equipment Description	Typical Duty Cycle (percent)	Spec Lmax (dBA)	Actual Lmax (dBA)
Air Compressor	40	80.0	77.7
Backhoe	40	80.0	77.6
Compactor	20	80.0	83.2
Concrete Mixer Truck	40	85.0	78.8
Concrete Pump Truck	20	82.0	81.4
Crane	16	85.0	80.6
Crusher	40	N/A	86.5
Dump Truck	40	84.0	76.5
Excavator	40	85.0	80.7
Flatbed Truck	40	85.0	74.3
Gradall	40	85.0	83.4
Impact Pile Driver	20	95.0	101.3
Jackhammer	20	85.0	88.9
Loader	40	80.0	79.1
Roller	20	85.0	80.0
Trencher	50	82.0	80.4

Source: FHWA Roadway Construction Noise Model (RCNM) version 1.1
Note: N/A = not available.

Sound generated by a construction noise source typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers—such as walls, berms, or buildings, and elevation differences—can also reduce sound levels by up to 20 dBA[85].

Impacts to Neighborhood Sensitive Receptors

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously. As would be the case for construction of most land use development projects, construction of the proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level.

The City has not established noise limits for temporary construction noise. The Federal Transit Administration recommends a daytime noise level criteria of 90 dBA Leq (1-hour) for residential receptors, 100 dBA Leq (1-hour) for commercial and industrial receptors.[86] The noise levels from construction activity at the previously identified sensitive receptors are shown in **Table 10: Construction Maximum Noise Estimates**. As shown, construction noise levels would result in a maximum increase of 3.6 dBA above the residential significance threshold without implementation of LAUSD's SC's.

The proposed Project requires compliance with **SC-N-4** and **SC-N-8** which would require site-specific noise control measures to be implemented during construction. Implementation of **SC-N-8** would schedule the noisiest operations to occur between 7:00 AM to 7:00 PM and would delay noise generation until class instruction at the nearest classrooms has ended. Additionally, **SC-N-8** includes the use of exhaust mufflers would reduce construction noise levels by approximately 10 dB or more.[87] As such, maximum construction noise levels would not exceed the daytime noise level criteria of 90 dBA Leq (10hour) for residential receptors. Impacts would be less than significant with the compliance of existing measures.

85 Caltrans, *Technical Noise Supplement (1998)*, 33–40, 123–131.

86 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, September 2018, accessed September 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf*

87 FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, accessed July 2019, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

Table 10

Construction Maximum Noise Estimates

Nearest Off-Site Building Structures	Distance from Project site (feet)	Max Leq	Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold (dBA)
Residences north of the Project site across Cattaraugus Avenue	55[a]	90.8	90.0	+0.8
Residences west of the Project site across Canfield Avenue	55[a]	90.8	90.0	+0.8
Residences south of the Project site across Kincardine Avenue	60	93.6	90.0	+3.6
Residences east of the Project site across Robertson Boulevard	75	91.7	90.0	+1.7
Preschool uses east of the Project site across Robertson Boulevard	155	85.4	90.0	+0.0
Church south of the Project site along Robertson Boulevard	230	81.9	90.0	+0.0
(Continuation School) Educational Uses north of the Project, along Cattaraugus Avenue	145	86.0	90.0	+0.0
(Recording Connection Audio Institute) Educational Uses, north of the Project along Hargis Street	275	80.4	90.0	+0.0
(Beverly Wood Retirement Home) Senior Home North of the Project along Hargis Street	275	80.4	90.0	+0.0
(Kenric Inc-Church of Christ) Church uses south of the project site across from Kincardine Avenue	105	88.8	90.0	+0.0

Assumed impact pile driving would not occur within 100 feet of nearest sensitive receptors.

Source: FHWA, RCNM, version. 1.1. Refer to **Appendix G: Attachment B** for Construction Noise Worksheets

On-Campus Receptors

Existing buildings will be demolished and new structures will be built on a functioning, full-time high school campus. Most of the noise-generating construction activities will, for several days at a time, be near classroom buildings which would create potential for noise disturbance. As shown above, construction noise levels within 55 feet from construction activities that have a direct line of sight may experience exterior noise levels as high as 93.6 dBA. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 68.6 dBA.

LAUSD's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would

generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Implementation of **SC-N-4** would require LAUSD or its Construction Contractor to coordinate with the school to schedule high noise or vibration producing activities at times that minimize disruption to classes. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions. Additionally **SC-N-8** requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers capable of attenuating construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. If construction noise disruption cannot be avoided the contractor would install noise barriers, as appropriate to limit construction noise levels (SC-N-9). Impacts would be less than significant with the compliance of existing measures.

Off-Site Construction Noise

Construction of the Project would require haul and vendor truck trips to and from the site to export demolition debris and soil and deliver supplies to the site. Trucks traveling to and from the Project site would be required to travel along a haul route approved by the City. Approximately 2,210 total hauling trips would take place during Phase 2 demolition, 7,189 total hauling trips would take place during Phase 3 demolition, and 26 total hauling trips would take place during grading. Haul truck traffic would take the most direct route to the appropriate freeway ramp.

Noise associated with construction truck trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of truck trips in a day. Project truck trips which includes medium- and heavy-duty trucks would generate noise levels of approximately 44.7 to 54.6 dBA, respectively, measured at a distance of 25 feet along South Robertson Boulevard. As shown in **Table 7**, existing noise levels at the Project site ranged from 55.0 dBA to 72.2 dBA. The noise level increases from truck trips would be below the significance threshold of 5 dBA.

Construction noise impacts to nearby residents would be limited through the implementation of **SC-N-4** and **SC-N-8**. With the implementation of **SC-N-9, which** would minimize construction noise impacts to the students and staff in the classrooms during active instruction, as well as the adherence to allowable construction times provided in Section 41.40(a) of the City Municipal Code, the construction activities for the proposed Project would not generate a substantial temporary increase in ambient noise levels that are in excess of applicable noise standards. Noise impacts during construction would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. LAUSD Standard Condition **SC-N-4** requires the construction contractor to consult with the school and nearby land uses prior to performing construction activities that have the potential to create high noise or vibration levels. However, the City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans Transportation and Construction Vibration Guidance

Manual[88] is used as a screening tool to assess the potential for adverse vibration effects related to structural damage.

Construction Impacts

Table 11: On-Site Construction Vibration Impacts—Building Damage presents construction vibration impacts associated with on-site construction in terms of building damage. As shown in **Table 11**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold of 0.2 peak particle velocity (PPV) inches per second (ips) at the nearby residential uses or at the other nearby buildings. Furthermore, the proposed Project requires compliance with the Program EIR Recommendations and LAUSD SCs, including **SC-N-4 t**hrough **SC-N-7** which include site-specific vibration control measures. As such, vibration impacts during construction would be less than significant.

Groundborne noise originates from groundborne vibration at higher frequencies, specifically in the range from about 30 Hz to about 200 Hz. In this vibration range, groundborne vibration may excite bending resonances in the floors and walls of buildings, which then radiate a rumbling noise directly into the rooms. Since the proposed Project would not produce groundborne vibration at 30 Hz or above (see **Table 11**), the proposed Project would not produce excessive groundborne noise level.

Table 11

On-Site Construction Vibration Impacts – Building Damage

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment							Significance Threshold (PPV ips)
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer	
FTA Reference Vibration Levels at 25 feet								
	0.644	0.210	0.089	0.089	0.076	0.035	0.003	–
Residences north of the Project site across Cattaraugus Avenue (55 feet)[a]	0.081	0.064	0.027	0.027	0.023	0.011	0.001	0.2
Residences west of the Project site across Canfield	0.081	0.064	0.027	0.027	0.023	0.011	0.001	0.2

88 Caltrans, *Transportation and Construction Vibration Guidance Manual (September 2013)*, accessed February 2020, https://cityofdavis.org/home/showdocument?id=4521.

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment							Significance Threshold (PPV ips)
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer	
Avenue (55 feet)[a]								
Residences south of the Project site across Kincardine Avenue (60 feet)	0.173	0.056	0.024	0.024	0.020	0.009	0.001	0.2
Residences east of the Project site across Robertson Boulevard (75 feet)	0.124	0.040	0.017	0.017	0.015	0.007	0.001	0.2
Church uses east of the Project site across Robertson Boulevard (155 feet)	0.042	0.014	0.006	0.006	0.005	0.002	0.000	0.2
Preschool south of the Project site along Robertson Boulevard (230 feet)	0.023	0.008	0.003	0.003	0.003	0.001	0.000	0.2
Continuation School North of the Project site, along Cattaraugus Avenue (145 feet)	0.046	0.015	0.006	0.006	0.005	0.003	0.000	0.2
Education Use and Retirement Home North of the Project	0.018	0.006	0.002	0.002	0.002	0.001	0.000	0.2

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment							Significance Threshold (PPV ips)
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer	
site along Hargis Street (275 feet)								
Church Use South of the Project site across Kincardine Avenue (105 feet)	0.075	0.024	0.010	0.010	0.009	0.004	0.000	0.2

[a] Assumed impact pile driving would not occur within 100 feet of nearest sensitive receptors.
Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.
Source: Refer to **Appendix G Attachment C** for construction vibration worksheets.

Operation Impacts

School operations do not involve sources that cause substantial ground-borne vibration. Therefore, the Project will not result in long-term significant impacts due to ground-borne vibration or noise levels. No groundborne vibration or noise impacts is expected during operation.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airport is the Santa Monica Airport, located approximately 4.3 miles southwest of the Project site. The Project site is located outside of the 60 dBA CNEL noise contours of Santa Monica Airport.[89] No impacts would occur from aircraft noise.

89 City of Santa Monica, *Calendar Year 2017 CNEL Contours Santa Monica Municipal Airport (May 2018).* https://www.smgov.net/uploadedFiles/Departments/Airport/Noise_Mitigation/2017 percent20CNEL percent20Noise percent20Contours.pdf. Accessed March 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☐	☐	☒	☐
b. Create unsafe routes to schools for students walking from local neighborhoods?	☐	☐	☒	☐
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☐	☒

Explanation:

A Site Circulation Report has been completed for the proposed Project and is included in **Appendix H: Site Circulation Report**.

LAUSD has SCs for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-3	LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts.

LAUSD Standard Conditions of Approval	
	• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less Than Significant Impact.

The proposed Project would design new student drop-off, pick-up, bus loading areas, and parking areas in accordance with the School Design Guide per **SC-PED-5**. In addition, the District has developed an OEHS Traffic and Pedestrian Safety Program with performance guidelines per **SC-PED-2**. These measures minimize safety hazards to pedestrians and ensures minimal incompatible uses are incorporated into the design. Vehicular traffic surrounding the proposed Project site would not be impacted since the Project footprint is entirely contained within the limits of the Hamilton HS campus and would not alter the existing vehicle flow surrounding the Project site through changes in ingress and egress. Furthermore, the proposed Project would reduce the existing capacity of the school and not alter the nature of existing operations. Therefore, no impacts to pedestrian safety would occur.

b) Create unsafe routes to schools for students walking from local neighborhoods?

Less Than Significant Impact.

During construction, the contractors would be required to submit and implement a Construction Worksite Traffic Control Plan to OEHS for review per **SC-T-4**. **SC-T-4** would ensure pedestrian safety measures, access, and warning signs during construction are properly implemented. The proposed Project would also be required to comply with all Federal, State, and local regulations and programs. With the implementation of **SC-T-4** and the compliance with existing regulations and programs, the impacts to students walking from local neighborhoods would be reduced to less than significant during construction.

During operation, the proposed Project would not be altering any existing routes to Hamilton HS as all proposed Project components are contained within the campus and no alterations to egress and ingress would occur. Therefore, there would be no operational impacts on students walking from local neighborhoods. No mitigation measures or further study would be required.

c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

No Impact. The existing Project site is currently located adjacent to a major arterial roadway and a freeway. As a participant of the Caltrans SR2S program, LAUSD schools coordinate with Caltrans, local law enforcement, and transportation agencies to ensure the pedestrian safety of its students and staff. Additionally, the proposed Project would not alter any existing pedestrian travel routes for students and staff walking to Campus. Since all components of the proposed Project are located within the Project site, no impacts to existing pedestrian safety relating to an adjacent major arterial roadway or the freeway is expected. No mitigation measures or further study would be required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Explanation:

There are no population and housing LAUSD SCs that apply to this Project.

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. The proposed Project would make physical changes to Hamilton HS and would not increase enrollment or student capacity. In addition, the proposed Project does not include features such as new homes or businesses that may induce growth. The proposed Project also does not include the extension of roads or other infrastructure that could indirectly induce growth. It is anticipated that construction workers would travel to the work site from their own personal homes and would not need to move to the area. Construction of the Project would not induce substantial population growth in the area either directly or indirectly. Therefore, impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is an educational facility and is not used for housing. The proposed Project would not displace existing people or housing resulting in the need for replacement housing. Therefore, no impacts to housing would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PS-1	If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 2. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

a) Fire protection?

Less than Significant Impact. The County Fire Department (LACoFD) currently provides fire protection and emergency medical services to the Project site. The Project site is served by Los Angeles Fire Department Fire Station 43, located approximately 1.6 miles from the site. The proposed Project would not make any programmatic changes and would not increase students; therefore, it would not increase the need for fire protective services. LAUSD is required to coordinate with LACoFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with **SC-PS-1**. Additionally, the Project would not require construction of new or expanded fire stations. Therefore, impacts would be less than significant. No mitigation or further study is required.

b) Police protection?

Less than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) is responsible for providing police protection services to the Project site and creating safe passages for students, staff, and the community.[90] Hamilton HS is under the jurisdiction of the LASPD. However, the everyday campus activities

90 Los Angeles School Police Department (LASPD). "About LASPD." https://achieve.lausd.net/Page/15609. Accessed February 2020.

are overseen by the principal, vice principal, teachers and other staff members. The Los Angeles Police Department (LAPD) would provide additional police protection services to the Project site. The nearest LAPD station is the Culver City Police Department Station located approximately 1.3 miles from the Project site. As explained above, the changes to Campus access and circulation would be less than significant after the implementation of **SC-PS-1**. Further, as the Project is not expected to increase student capacity or size of the site, current government facilities would be sufficient to properly serve the campus. Therefore, the proposed Project would have a less than significant impact on these public services. No mitigation or further study is required.

c) Schools?

Less than Significant Impact. The proposed Project would make physical changes to the existing high school campus to enhance existing programs. The environmental effects of the construction and operation of the Project are considered throughout the environmental analysis in this Negative Declaration. The modernized Campus would not induce growth in the community, increase students or staff at the Campus, or otherwise increase demand for school services. The Project would not have an adverse physical impact on any existing schools and would have a beneficial impact on Hamilton HS.

However, school construction would require the temporary relocation of students, during athletic events or when an auditorium is required. Nearby schools and/or public facilities with the appropriate facilities and the space to accommodate the school events would be sought out to accommodate school events. Coordination between LAUSD, the schools' staff, and the appropriate representatives of the public facilities would take place to minimize any disruptions to the existing functions of the facilities providing the accommodation for the students. Therefore, impacts would be less than significant.

d) Parks?

Less than Significant Impact. As previously mentioned, the school construction would require temporary relocation of students for physical activity classes. Students relocation for athletic and theater activities would potentially result in the use of nearby parks. The potential activity occurring at local parks would be minimal and short-term. The potential use of nearby parks would not have a substantial adverse physical impact on any parks or necessitate the construction of news parks. The Project would not result in the need for construction of new recreational facilities. The Project would not induce growth in the community, increase students or staff, or otherwise increase the demand for parks. Therefore, impacts would be less than significant.

e) Other public facilities?

Less than Significant Impact. Student relocation for athletic or assembly hall activities would potentially result in a minimal increase in the use of other public facilities such as City Hall, veteran's center, libraries etc. However, the Project would not result in significant impacts associated with the provision of other new or physically altered public facilities. Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The Project would not result in an increase in students or staff, or induce population growth. Therefore, impacts to other public facilities would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION. Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Explanation:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. Student relocation for athletic and assembly hall activities would temporarily increase the use of existing neighborhood and regional parks or other recreation facilities. However, as specified in **Section XVI(c)**, these visits/gatherings would be coordinated between LAUSD staff and necessary personnel. Appropriate measures through coordination would be taken in order to prevent physical deterioration of neighborhood and regional parks or other recreational facilities. Therefore, impacts to existing parks or other recreational facilities would be less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less than Significant Impact. The Project activities include installation of a new track and football field and new baseball and softball fields within the existing school campus. The environmental effects of the construction and operation of the Project, including the new recreational facilities, are considered throughout the environmental analysis in this Negative Declaration. The Project would not require the construction or expansion of recreational facilities outside of LAUSD-owned property. Athletic and theater events would temporarily be relocated to recreational facilities outside of LAUSD-owned properties during construction, but events would only be hosted by recreational facilities with the appropriate capacities for the designated events. Coordination would take place between appropriate personnel to ensure adverse physical effects would not occur at the facilities temporarily used for school activities. Therefore, environmental impacts related to community recreational facilities would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRANSPORTATION AND CIRCULATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Explanation:

A Site Circulation Report has been completed for the proposed Project and is included in **Appendix H**.

LAUSD has SCs for minimizing impacts to transportation and circulation. Applicable SCs related to transportation and circulation impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact.

Existing Conditions

The proposed Project site is bounded by Cattaraugus Avenue to the north, Robertson Boulevard to the east, Kincardine Avenue and Livonia Avenue to the south, and South Canfield Avenue to the west. Interstate-10's Robertson Boulevard exit ramp is adjacent to the east side of the Campus and traffic flow exits the ramp onto Robertson Boulevard and Kincardine Avenue. There are four bus transit stops serving the Metro 17 bus line located near the campus on both sides of Robertson Boulevard. The transit stops are located at two separate intersections at South Robertson Boulevard & Cattaragus Avenue and South Robertson Boulevard & Kincardine Avenue. The Campus is approximately one-half mile north of the Metro Expo Line Culver City Station which serves as the primary commuting method for some students on Campus.[91]

Sidewalks are available on both sides of the streets within the school zone surrounding the proposed Project. Existing crosswalks are found on both sides of South Robertson Boulevard & Cattaraugus Avenue and South Robertson Boulevard & Kincardine Avenue, east of the proposed Project. South Robertson Boulevard is identified as part of the Pedestrian Enhanced Districts within the City Mobility Plan 2035. The Pedestrian Enhanced Districts are designated areas that prioritize pedestrian mobility improvements over other modes of transportation.[92] Cattaraugus Avenue to the north of the Campus is identified as part of the Neighborhood Enhanced Network, slow-moving, locally-serving streets that promote safety of all roadway users.

Bicycle facilities are not available within the school zone surrounding Hamilton HS; however, South Robertson Boulevard is identified as part of the Bicycle Lane Network, a network of arterial streets prioritizing bicycle movement. School administration suggests that approximately 20 to 30 students bike to school on a daily basis.

Construction

Construction equipment, haul trucks, and construction personnel are expected to temporarily add to the existing traffic circulation of the area. Construction contractors are required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction, as per **SC-T-4**. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. The contractor will also provide traffic control to adjacent streets during the construction period to ensure construction does not impede existing vehicle and multimodal traffic flow on surrounding streets. In the event street closure would be needed, the contractors and LAUSD will coordinate with the City to minimize any impacts to the travelling public and to ensure the safety of student and staff. LAUSD would also encourage the contractor to limit construction-related truck traffic to off-peak commute periods as much as is feasible.

Operation

The operation of the Proposed Project would remain the same as the existing operation at Hamilton HS without increasing capacity. As the improvements of the proposed Project would be confined to the areas on Campus, the transportation operation of the surrounding area is expected to remain the same.

91 LIN Consulting Inc. *LAUSD School Modernization Project- Alexander Hamilton High School*, "Site Circulation Report." October 17, 2018.

92 Los Angeles Department of City Planning, *Mobility Plan 2035* (California: Los Angeles, 2016).

The proposed Project would comply with all federal, State, and local ordinances, policies, plans, and programs. As such, the proposed Project would not conflict with existing plans and programs addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No mitigation or further study is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less Than Significant Impact. The proposed Project during construction would involve construction equipment and additional vehicles for construction workers to reach the Project site. Construction equipment would primarily remain on site for the duration of the construction with the exception of haul trucks. An estimated 9,425 haul truck trips are expected over the lifetime of the proposed Project.[93] LAUSD encourages carpooling for construction contractors getting to and from the Project site and will work with the contractor to minimize vehicle trips to the extent feasible. Construction equipment and contractor travels to the Project site would be temporary in nature, ceasing at the completion of the proposed Project.

During operation, the proposed Project does not include any capacity increase and the nature of the operation would remain the same. The proposed Project would have no impact pertaining to vehicle miles travelled during operation and a less than significant impact during construction. No mitigation or further study is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. During construction, the proposed Project would temporarily require construction equipment to move in and out of the Project site. All operations of construction equipment would be coordinated with LAUSD and the City. The construction contractor is required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction which would present the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies per **SC-T-4**. In the event that road closure and/or large equipment maneuver is required, the construction contractor would provide traffic control personnel to ensure the safety of all surrounding transportation users. Additionally, the proposed Project would comply with all federal, State, and local ordinances.

During operation, the proposed Project improvements are contained within the existing campus. No roadway designs or alterations surrounding the proposed Project is included. Therefore, no impacts to incompatible uses or geometric design features is expected. No mitigation or further study is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. The proposed Project would involve construction equipment and additional vehicles from construction personnel during construction. As mentioned in Threshold (c), all construction equipment operations would be coordinated with LAUSD and the City to minimize any impacts to surrounding traffic flow. A Construction Worksite Traffic Control Plan would also be required prior to the start of

93 Meridian Consultants LLC, *Noise Study*. March 2020.

construction at Hamilton HS per **SC-T-4**, which will minimize any unforeseen circumstances related to construction equipment usage and construction personnel travel. Traffic control would be provided by the contractor to further ensure the construction operation does not impact existing traffic flow. These measures would minimize Project impacts to emergency access to less than significant impact.

During operation, the proposed Project would not alter existing traffic patterns outside the proposed Project site. The proposed Project would also not involve any increase in capacity or change use of the Project site. Since no changes to existing operation and the surrounding area is expected, no impact would result to emergency access during operation. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

XIX. TRIBAL CULTURAL RESOURCES.

Has a California Native American Tribe requested consultation in accordance with PRC section 21080.3.1(b)?

☒ Yes ☐ No

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

Explanation:

A Sacred Lands File record search was completed by the Native American Heritage Commission and is included in **Appendix I: Sacred Lands File Record Search**.

LAUSD has SCs for minimizing impacts to tribal cultural resources. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable). Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources. The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k)?

Less than Significant Impact. AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal cultural resources (TCRs), as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[94]

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project areas of the District's proposed Projects. These Projects included the eleven (11) Comprehensive Modernization Projects, including this Project, and one (1) Classroom Expansion Project as referenced in the District's notification letter dated January 8, 2019. Request for consultation on all twelve (12) District Projects was received from the Gabrieleno Band of Mission Indians – Kizh Nation on January 9, 2019. Two consultation dates were set for March 21, 2019 and May 21, 2019. As a result of the consultation, the Gabrieleno Band of Mission Indians – Kizh Nation provided the District with suggested mitigation measures for the Projects.

Following the meeting, the District sent a conclusion letter on June 19, 2019 determining that the Gabrieleno Band of Mission Indians–Kizh Nation did not provide sufficient evidence demonstrating that the Project site has Tribal Cultural Resources (TCRs) as defined by PRC 21074. Chairman Salas responded to this letter with a request for an additional meeting. At the requested meeting, held via conference call on August 15, 2019, Chairman Salas provided additional oral history and stated that because of the proximity to known TCRs, the Project may encounter resources. Following the meeting and the District's request for supporting evidence, Chairman Salas provided further tribal history and requested to have a Native American monitor present during all ground disturbances. Included with this request was a document describing the same mitigation measures that were previously provided for TCRs. In addition, the following documents (titles are publicly available) were included in response to the District's request for supporting documentation:

1. The old Spanish and Mexican ranchos of Los Angeles County (Gerald 1937);
2. Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937 (Kirkman 1938);
3. Official map of the County, California (Wright 1898);
4. Excerpt describing the location of a village
5. Excerpt describing habitations (Southwest Museum Leaflet)
6. Excerpt describing the number of huts in a rancheria

A review of these documents did not find substantial evidence of an existing TCR within the Project site. Moreover, a Sacred Lands File (SFL) was completed for the Project site on August 14, 2020 and the results for local tribal resources were negative (See **Appendix I**). No supporting documents indicated why the Project site

94 CNRA, *AB 52 Regulatory Update*. https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/ab52/CNRA-Rulemaking-File-8-17-16.pdf.

should be considered to have a high potential for containing TCRs; therefore, Native American monitoring for TCRs during all ground disturbances is not required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with **SC-TCR-1** and **SC-TCR-2** would ensure that potential impacts to TCRs are avoided. Impacts to Tribal Cultural Resources would be less than significant.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact. In order to comply with CEQA and reduce any potential significant impacts associated with Tribal Cultural Resources, LAUSD would implement **SC-TCR-1** and **SC-TCR-2**. Under LAUSD's **SC-TCR-l**, if evidence of Native American resources is uncovered, all work shall stop within a 30-foot radius of the discovery. In the unlikely event that Tribal Cultural Resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. If Tribal Cultural Resources are discovered during construction, LAUSD shall implement SCs for evaluating and appropriately treating such resources (**SC-TCR-2**), which is consistent with the Gabrieleno Band of Mission Indians-Kizh Nation's suggested mitigation measures.

As the Lead Agency, LAUSD has determined that the AB 52 consultation did not result in the identification of a Tribal Cultural Resource within or near the proposed Project site as defined by PRC 21074. LAUSD further concludes that the inclusion of **SC-TCR-l** and **SC-TCR-2** for the proposed Project would ensure that any potential impacts to Tribal Cultural Resources are less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to utilities and service systems. Applicable SCs related to utilities and service systems impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide.** Establishes a minimum nonhazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight.
SC-USS-2	LAUSD shall coordinate with the City Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multipurpose rooms.

LAUSD Standard Conditions of Approval	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The existing Project site is located in a highly developed area with existing utility services including water, wastewater treatment and stormwater drainage, electric power, natural gas, and telecommunication facilities. Construction at the Project site would require temporary additional usage of water, electric power, diesel, and natural gas. However, the additional utility usage during construction would be minimal and well within the capacity of the existing utility facilities.

The operation of the proposed Project would not increase utility consumption through capacity increase or modification to existing operations. Due to the age of the existing structures and facilities, the new buildings and replacement facilities would be more resource efficient when compared to the existing structures and facilities. All new buildings within the District are required to be built with the capability to include solar panels that would support at least 50 percent of the energy required for the buildings.[95] Energy efficient building components would be incorporated to minimize energy use on Campus. Storm water runoff from new construction will be intercepted within the site to the extent feasible by roof drains and catch basins to reduce the amount of discharge off-site. On-site underground storage chambers will also be constructed to ensure discharge flow rate do not exceed existing discharge flow rates.

With the incorporation of LAUSD CHPS, **SC-USS-2** to **SC-USS-3**, and **SC-GHG-1** to **SC-GHG-3**, the Campus' resource consumption and stormwater production are expected to reduce with the implementation of the Project. Therefore, no new or expanded utility facilities will need to be constructed and no relocations of the existing facilities would be needed. No mitigation or further study is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. LADWP provides water to the existing Project site. The primary water sources for LADWP are from the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by Metropolitan Water District of southern California (MWD)), and Colorado River Aqueduct (supplied by MWD). Additional sources include recycled water and other imported water sources.

95 LAUSD, *Collaborative for High Performance Schools (CHPS)- Alexander Hamilton High School.*

The historical usage of water in the region depends on a number of factors, including population growth, weather, water conservation, drought, and economic activity. The 24-year average water demand in the LADWP's Service Area is 611, 331 AF (Acre-Feet).[96] According to the Urban Water Management Plan (UWMP) the water demand projected by fiscal year 2040 is 675,685 AF without conservation measures. The UWMP has set a target use number for fiscal year 2040 at 565,600 AF with a 25 percent water demand use reduction under its Sustainable City pLAn (pLAn) with additional passive and active conservation action plans. Using a mixed source water portfolio, LADWP is prepared to supply the water for the foreseeable 25 years, up to the projected water demand in 2040.

The Project site would be expected to increase its water use during the construction phase of the proposed Project to assist with dust suppression measures and related construction activities. However, the water usage during the construction phase would be minimal and is not expected to impact the availability of the existing water supply. During operation, the proposed Project would not increase the existing capacity at Hamilton HS or change the nature of its operation to require additional water usage. The proposed Project is expected to see a reduction in water demand as the new buildings and associated upgrades would be more water efficient than the existing conditions on Campus.

Lastly, the proposed Project does not qualify under SB 610's definition of a "project" and, therefore, does not require the completion of a Water Supply Assessment. The proposed Project would have a less than significant impact on available water supply to serve the proposed Project during normal to dry years. No mitigation or further study is required.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

Less Than Significant Impact. As previously referred to in Threshold (a), construction of the proposed Project will involve a minor increase in wastewater production due to construction activities and construction personnel. However, the minor increase in wastewater production is temporary and would cease once construction is completed. The operation of the proposed Project would not include expansion or increase in capacity. Installation of newer facilities would also reduce the amount of wastewater generated. Therefore, the proposed Project would have a less than significant impact on the adequacy of the local wastewater treatment capacity. No mitigation or further study is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The City is serviced by the County Sanitation Districts Solid Waste Management Systems (Districts). The existing Districts have a capacity to accommodate up to approximately 22,000 tons of nonhazardous refuse each day, for six days a week. There are currently four sanitary landfills,

96 Los Angeles City Department of Water and Power, "Urban Water." https://wuedata.water.ca.gov/public/uwmp_attachments/3381116569/2015 percent20Urban percent20Water percent20Management percent20Plan-LADWP.pdf. Accessed February 2020.

two recycling centers, one transfer station, and one refuse-to-energy facility. In addition to the existing collection facilities, the Districts have also entered into Joint Powers Agreements with the City of Commerce and the City of Long Beach to create the Commerce Refuse-to-Energy Authority and southeast Resources Recovery Facility (SERRF) Authority, which would be designed to incinerate up to an additional 1,650 tons of refuse per day.[97]

The City produces approximately 18,000 tons of nonhazardous solid waste per day, six days a week. Approximately 11,800 tons of this refuse per day is disposed of within three of the landfills within the City, with the remaining refuse exported out of the City to other public and private disposal sites in the surrounding area.

During construction, the proposed Project would generate demolition and construction related solid waste. However, the amount of solid waste would be minimized per **SC-USS-1** requirements. **SC-USS-1** requires the minimum recycling of 75 percent of the nonhazardous construction debris by weight. In addition, the proposed Project would comply with all waste recycling/reuse requirements in the California Green Building Code and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management which requires the collection and separation of all construction and demolition waste materials on-site and that they be reused or recycled to the extent feasible. Along with the implementation of the SCs and compliance with all Federal, State, and local regulations and programs, the solid waste generated by the proposed Project would be less than significant.

During operation, the proposed Project would not expand on existing uses or increase enrollment capacity to serve additional students. In contrast, the proposed Project would reduce the number of classrooms available on site. Hamilton HS would also implement **SC-USS-3**, which would implement recycling programs on Campus to reduce solid waste production. With the reduced capacity and the implementation of **SC-USS-3**, the proposed Project is expected have a less than significant impact during operation on solid waste production.

The proposed Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. No mitigation or further study is required.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The proposed Project would comply with all federal, State, and local management and reduction statutes and regulations related to solid waste. As referred to in threshold (d), the proposed Project during construction would incorporate **SC-USS-1** to recycle at least 75 percent of the construction and demolition solid waste. Operationally, **SC-USS-3** would reduce the solid waste generated on site by incorporating an on-site recycling program. Therefore, the proposed Project will have a less than significant impact on federal, State, and local management and reduction statutes and regulations related to solid waste. No mitigation or further study is required.

97 *Citywide General Plan Framework Final Environmental Impact Report*, January 19, 1995. https://planning.lacity.org/odocument/69ed1287-ec42-45a0-b7af-ea668003604e/GPF_FEIR_DEIR_Title.pdf. Accessed March 2, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE.				
Is the project located in or near State responsibility areas or lands classified as high fire hazard severity zones?	☐ Yes		☒ No	
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Explanation:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or another approved driving surface and must be capable of supporting at least 75,000 pounds. Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of a building. Additionally, the Project would comply with **SC-PS-1**, which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. The District requires the development of an Emergency Preparedness Plan for all its schools per **SC-PS-2**, which ensures emergency preparedness and response procedures are implemented. No impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project site is in an urban area, and there is no wildland susceptible to wildfire on or near the site. Furthermore, the California Department of Forestry and Fire Prevention (CAL FIRE) does not classify any adjacent areas as a Very High Fire Hazard Severity Zone[98]. Project development would not place people or structures at risk from wildfire. No impact would occur.

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project site is in an urbanized area surrounded by development. The campus renovations would not require the installation of new infrastructure that may exacerbate fire risk. No impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed Project is located within a highly developed area with flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. The Project would not lead to the result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

98 CAL FIRE, *The Fire and Resource Assessment Program (FRAP),* Very "High Fire Hazard Severity Zones (FHSZ) Maps in SRA and LRA." https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Explanation:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The proposed Project is located in a highly developed area and not located near or on any designated habitat that could support a fish, wildlife, or plant community. As referred to in **Section IV: Biological Resources**, the proposed Project would also incorporate SCs to comply with the Migratory Bird Treaty Act for any trees being removed. Compliance with all Federal and State regulations would be required, in addition to LAUSD's Tree Trimming and Removal Procedure. Therefore, impacts related to degrading the quality of the biological environment would be less than significant impact.

Hamilton HS is listed as a historic district and contains two contributor buildings on its campus- the Administrative Building and the Assembly Building. The Administrative Building and the Assembly Building were also found individually eligible for listing in the National and California Registers In addition, the DWP Distribution Station #20 adjacent to the Project site was found eligible for listing in the National Register and California Register. For the purpose of this CEQA analysis, these buildings would be considered historical resources under CEQA. **Section V: Cultural Resources** examined the proposed Project's impact on these historical resources and found the proposed Project would not have the potential to degrade or eliminate

important examples of these historical resources. Therefore, impacts related to **e**liminating important examples of the major periods of California history or prehistory would be less than significant impact.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. Based on the assessments provided in this document, the proposed Project would not contribute to cumulatively considerable impacts through compliance with existing regulations, policies, and programs, and the incorporations of SCs. Furthermore, the proposed Project is expected to reduce existing resource usage through reduced operating capacity and more efficient facilities. Therefore, the Project would not be contributing to an adverse cumulative impact.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Based on the assessment provided in this study, there are no significant impacts. LAUSD SCs and LAUSD School Design Guidelines will be incorporated to minimize the potential impacts of the proposed Project. In addition, the proposed Project would comply with all Federal, State, and local regulations and programs, further reducing any potential adverse effects the proposed Project may have on human beings. The proposed Project would have a less than significant impact on human beings either directly or indirectly.

5. List of Preparers

5.1 LEAD AGENCY

Los Angeles Unified School District, Office of Environmental Health & Safety

Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017

Gwenn Godek, CEQA Advisor/Contract Professional
William Meade, Environmental Planning Specialist
Christy Wong, Assistant CEQA Project Manager

5.2 CEQA CONSULTANT

Meridian Consultants LLC.

920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Joe Gibson, Partner
Christ Kirikian, Principal
Christine Lan, Senior Project Manager
Zulema Renteria, Staff Planner
Holly Galbreath, Staff Planner
Lisa Maturkanic, Senior Operations Administrative Manager
Rachel Bastian, Publications Specialist
Tom Brauer, Graphics Specialist

Historic Resources Group (Cultural Resources)

John LoCoscio, Principal
Kari Michele Fowler, Senior Preservation Planner

[*This page intentionally left blank.*]

Appendix

Appendices are on CD.

A. Air Quality Study
B. Arborist Report
C. Historic Resource Evaluation Report
D. Historic Resources Technical Report
E. Report of Geotechnical Investigation
F. Phase I Environmental Site Assessment
G. Noise Study
H. Site Circulation Report
I. Sacred Lands File Record Search
J Response to Comments

Appendix

[*This page intentionally left blank.*]